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

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

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

Attached documents:
Comment ID: PSLPA16/411  Respondent: 15205537 / Susan Cini  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  
Answer (if comment is on questions 1-7 of the questionnaire): ()  

I am writing to strongly object to the proposed building on green belt land in the area of Send, Ripley, Send Marsh, Burnt Common and Clandon.  
The building of new homes on urban brown field site or in existing villages must be the first consideration to provide homes for our young people and families who want to stay in the area, or for people who need to move here for work.  
I object strongly to the changes in the Green Belt Boundaries and also to the buildings proposed at Garlicks Arch!  
The present infrastructure is already unable to cope with the current residents .... Schools, doctors, roads .....  
The A3 is at a standstill both north and south of Ripley causing delays and hold ups into and past Guildford and trying to access the M25 at Wisley. No thought has been given to the traffic situation!  
The strength of feeling against these proposals is very strong in the area  

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

Comment ID: PSLPA16/414  Respondent: 15205569 / Mark Gurdon  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  
Answer (if comment is on questions 1-7 of the questionnaire): ()  

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

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

Comment ID: PSLPA16/413  Respondent: 15205569 / Mark Gurdon  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

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

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

Attached documents:

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

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

1. I object to the removal of Send from the Green Belt because the village and its countryside provides a necessary buffer between Woking and Guildford.
2. I object to the building on the Green Belt at Send at Garlick’s Arch, Clockbarn Nurseries and Send Hill because it is not justified by any special circumstances and the fact that Green Belt is meant to be permanent and not continually eroded.
3. I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford’s urban brownfield areas much closer to existing transport hubs.
4. I object to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially.

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

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

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

Attached documents:

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Comment ID: PSLPS16/545  Respondent: 15205569 / Mark Gurdon  Agent:

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

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

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

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

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

Attached documents:

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Comment ID: PSLPS16/544  Respondent: 15205569 / Mark Gurdon  Agent:

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

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

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

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1. I object to the development at Garlick’s Arch for 400 houses because it was sprung on the village at the last moment with only 2 weeks’ notice and without any prior consultation and is not required in terms of housing need either for the village or the borough.

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

3. I object to the development at Garlick’s Arch because the site has a particular conservation sensitivity since it is covered in ancient woodland. Trees which existed in the 16th century would be endangered. The site is also subject to flooding.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<tr>
<td>1. I object to the proposed new interchange onto the A3 at Burnt Common because it would be disastrous for Send and the (A247) would be gridlocked all day.</td>
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<td>2. I object to the proposed new interchange onto the A3 at Burnt Common because the Transport Evidence is incomplete and unreliable and shows there will be congestion because Send would be used as a cut through to the A3/M25.</td>
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<tr>
<td>1. I object to the development of 40 houses at Send Hill due to its high quality Green Belt amenity within an area of beautiful countryside which would be spoilt. The subsoil of the existing site contains documented unsafe land fill waste which is currently vented. The proposal to include 2 Travellers Pitches is completely inappropriate due to the narrow width single track country road providing insufficient access to the site.</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

1. I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.
2. I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

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

Attached documents: 

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Comment ID: PSLPA16/427  Respondent: 15205729 / John Walker  Agent:

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

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

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

I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no schedule for Garlick's Arch (A43), so the Plan takes no account of the infrastructure required for this site. It is therefore not fit for purpose.

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

Attached documents: 

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Comment ID: PSLPA16/426  Respondent: 15205729 / John Walker  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D).

The Plan's proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans.

But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on the Plan.

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

Attached documents:

Comment ID: PSLPS16/559  Respondent: 15205729 / John Walker  Agent:

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

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

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

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

Garlick's Arch is protected from development as Green Belt. There are no exceptional circumstances which allow for its removal from the Green Belt (Policy P2). Central Government state clearly that housing need is not an exceptional circumstance.

The Plan states the preference is to use of previously developed land, but GBC have removed a brownfield site at Burnt Common replaced it with Garlick's Arch.

The site is not appropriate because:
• There is no sustainable transport infrastructure.
• The site is liable to frequent flooding.
• The site has Ancient woodland and is a wildlife habitat, but no wildlife report for the site is in the Plan.
• There are no plans to improve local schools, medical or utilities to cope.

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

Attached documents:

Comment ID: PSLPS16/563  Respondent: 15205729 / John Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
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<td>I object to the employment strategy and impact at Garlick's Arch (A43) (Policies E2 and E5). There is no need for new industrial sites at Garlick's Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000 sq m proposed. That site was removed from the Plan without any reasoning. Furthermore the development at Garlick's Arch would result in the loss of four existing successful rural businesses, which have been for there decades employing local people and are therefore clearly sustainable.</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document? Attached documents:</td>
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<td>I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a) North facing ramps to the A3 at Burnt Common would be a disaster for local communities, which do need to access the A3 to the north, but the addition will draw in a huge amount of 'through' traffic. E.g. all traffic from London/M25 to Woking would go through Burnt Common, Send and Old Woking. This is not sustainable as this cannot be improved.</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document? Attached documents:</td>
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I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3).

The Garlick's Arch (A43) proposal would double the built area in the locality, and would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees.

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

Attached documents:

I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy 11).

There is too much traffic in our villages already and this plan will cause more congestion in Ripley, Send and Glandon, with no plan to improve that.

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

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

Attached documents:

I object to the lack of proper infrastructure planning for sites (Policy 11).

The Plan does not identify adequate infrastructure improvements to support the huge scale of development, especially at Garlick's Arch (A43) which has no infrastructure projects in the Infrastructure Schedule to support it. Local services, utilities and sewerage, doctors etc. are at or close to capacity.
There are no plans to improve the capability of the medical and police/emergency services to cover the 5000+ houses in the north east of the borough.

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

Attached documents:

**Comment ID:** PSLPP16/1224  **Respondent:** 15205729 / John Walker **Agent:**

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

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

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

I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy 12)

The A3 or M25 would have to be improved before any development is done. Highways England has no plans to even start considering improving the A3 before 2020. Clearly no real improvements are possible in the time frame of this Plan so the developments at Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25), should not take place.

I wish these objections to be fully taken into consideration and that the Plan is amended accordingly.

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

Attached documents:

**Comment ID:** PSLPP16/1214  **Respondent:** 15205729 / John Walker **Agent:**

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

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

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

I object to poor air quality concerns (Policy 13)

The huge developments being proposed, particularly in the north east of the borough will lead to considerable further congestion and to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

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

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<td>I object to not protecting the Green Belt (Policy P2).</td>
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<td>I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick's Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.</td>
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<td>The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick's Arch (A43).</td>
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<td>I object to development in areas which are at risk of flooding (Policy P4)</td>
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<td>The Plan does not take adequate account of flood risk as required by National Planning Policy.</td>
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<td>The site at Garlick's Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council's own assessment. This area has flooded many times in recent years and therefore the Council's assessment is not good enough to be included in the plan.</td>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2016).
These are my main reasons/ I object on these grounds / ...

1. I object to the Local Plan as the development proposed is not sustainable (Policy S1)

13,860 new houses proposed is not sustainable - it will damage local communities by over development, especially Ripley, Send and Clandon. The local communities don't need these houses. Wisley Airfield (A35) and Garlick's Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve the infrastructure for Garlick's Arch. The development should be in urban areas where there is sustainable transport.

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

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<td>I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need. A better alternative would be to blocks of build bed sitsin Guildford for single occupancy to house the thousands of immigrants seeking work in the UK.</td>
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I object to all erosion of the green belt and in particular the removal of Send from the Green Belt because the village and its
countryside provides a necessary buffer between Woking and Guildford. A vital lung for our congested and polluted town
centres.

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

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

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

I object to the proposal for travelers sites in Send. They should be subject to the same requirements as for other council
housing, in work, ability to pay rent, a named person to pay rates, utility bills, council tax, need. With their high social need
these sites need to be located next to main conurbations in Guildford and not in Send where local services are overloaded,
schools, Doctors Surgeries, banks, shops, groceries, and Public transport.

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

Attached documents:

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

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

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

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

**Attached documents:**

---

**Comment ID:** PSLPS16/551  **Respondent:** 15205921 / Elizabeth Howlett  **Agent:**

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

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

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

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

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

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

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

**Attached documents:**

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**Comment ID:** PSLPS16/550  **Respondent:** 15205921 / Elizabeth Howlett  **Agent:**

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

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

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

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

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

Attached documents:

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Comment ID: PSLPS16/553  Respondent: 15205921 / Elizabeth Howlett  Agent:

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

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

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

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

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

Attached documents:

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Comment ID: PSLPP16/1203  Respondent: 15205921 / Elizabeth Howlett  Agent:

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

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

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

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

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

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

**Attached documents:**

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<th>Comment ID:</th>
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I object to Policy A42 of the Local Plan because you have ignored my original objection and increased the number of houses from 45 to 60 houses. This will further increase the traffic entering Send Barnes Road. This road and intersection is already too narrow to take the existing traffic. The footpath at the nearby traffic lights is far too narrow, this footpath is used by mothers and children on the way to and from school. The path is so narrow that mothers cannot walk side by side. This is an accident black spot about to happen. This development is a further erosion of the green belt, which the Prime minister has said will not happen.

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

**Attached documents:**

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I object to policy A43, the development of 400 houses at Garlick's Arch. This is a huge development to be built on the green belt. This is unreasonable and out of all proportion to local needs. The Old Portsmouth Road from Burnt Common to the A3 roundabout is already overloaded. The intersection in Ripley regularly blocks solid during busy periods as does the slip road onto the A3. At the Burnt Common intersection the roundabout is regularly blocked with queues in all directions trying to feed from and on to the A3 slip into and onto Send Barns Lane.

I also wish to object to the setting aside for travellers and show people. Ther is no justifiable need. Your addendum notes state that you determined the need by ‘asking them’ very scientific. They children and mothers on these uncontrolled sites are particularly denied access to proper healthcare, and education. We need to break the cycle and provide permanent occupation, close to the services they need. Local services are already overloaded, local children already have to be bussed out of the area for their education.
I object to Policy A58 the construction of an industrial complex at Burnt Common. There is no need. If there is a need in Guildford it needs to be closer to Guildford Centre. There are several light industrial sites in Guildford and Woking that are an inefficient use of the space available. All need rebuilding with proper access to local roads, and some would provide space on the River Way frontage for council houses. I object to the term low cost housing, they are not value for money but cheap, poorly designed with insufficient storage, narrow staircases and little parking, irregular bus service and too far from the needs of those resident.

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

Attached documents:

I object to the above development.

Here follows some of the more important reasons.

1) The land is good quality, productive green belt.

2) The existing road network will not support the amount of traffic generated by the school and housing. Currently HGV’s turning into Glaziers Lane from the Aldershot Road have to use part of the opposite lane to get round.

Both bridges over and under the railway are at a dangerous angle to the existing road layout.

It seems to be a lack of judgement to suggest that many people will use the railway via Wanborough.
Station, they will not, and will use a car particularly when taking children to and from school (if the school is needed, there seems to be some doubt over this).

3) There are existing problems with both rain water, and sewage removal, and further development will add to the unacceptable situation.

4) The current power supply is prone to outage.

Before any decisions are made there must be a comprehensive plan to improve the existing road layout, and services, which must be paid for by the developer. He cannot be allowed to develop just because the area is flat without too many problems.

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

Attached documents:

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Comment ID: PSLPA16/420  
Respondent: 15206465 / Amanda Daniels  
Agent:

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

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

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

I'm writing to you with serious concerns over the draft plans for the plans to expand the housing in the Ripley/Wisley/Clandon area.

My family & I are residents of Ripley. I understand the need for additional housing in the area but have serious objections to the current plans put forward among our local villages. The OBJECTIONS I have are:

1) The plans for the manner in which to alleviate the additional traffic in the area: already the roads through Ripley become un-usable at certain times of day and the noise, pollution and lack of traffic control is unacceptable. The new plans will most certainly not alleviate the issue but make it many times worse. The plans for the new on/off ramp at Clandon will only serve to increase the traffic as opposed reduce it as well.

2) The erosion of the green belt.

3) The lack of provision for infrastructure, such as schooling & doctors surgeries.

4) The removal of our villages from the green belt.

5) The disproportionate amount of development in one area: ours are some of the most popular villages in the region and the reduction in their charm & beauty will be terminal for the future of them.

6) The lack of consultation period.

Please feel free to contact me should you wish to discuss in greater detail the issues that I have. There needs to be serious discussion with villagers on the current plans and greater consultation & effort to find more appropriate sites for new housing which could be built with suitable infrastructure in place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
**Comment ID:** PSLPA16/422  **Respondent:** 15206497 / Vivien Bancroft  **Agent:**

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

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

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

I OBJECT to the fact that the Local Plan takes no account of schools, doctors surgeries and roads that are already operating at full capacity. Another 4000 houses in this area with a conservative estimate of a further 8000 cars would be catastrophic.

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

Attached documents:

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**Comment ID:** PSLPA16/423  **Respondent:** 15206497 / Vivien Bancroft  **Agent:**

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

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

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

I OBJECT to the fact that GBC have failed to provide sound evidence in terms of the Employment Land Needs Assessment which shows that industrial space at Burnt Common IS NO LONGER NEEDED.

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

Attached documents:

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**Comment ID:** PSLPA16/421  **Respondent:** 15206497 / Vivien Bancroft  **Agent:**

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

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I moved back to the area seven years ago after living in Hertfordshire, having originally moved from Lancashire and the beautiful countryside of the Pennines. As a keen lover of the countryside and wildlife I was keen to move to a green belt area. I am writing to make my objections to proposed Garlick’s Arch and removal of the green belt.

I OBJECT to the removal of 15 villages, including Ripley and Send, from the green belt. This will lead to wholesale, and often inappropriate developments.

I OBJECT to the fact that GBC have not followed the correct process for Send and Ripley developments. Any significant changes to the 2014 proposals, such as the proposal development of Garlicks Arch, should have required another full consultation, which did not happen. This invalidates the whole process.

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

Attached documents:
I OBJECT to policy A43.30 the development of new four way interchange onto the A3 which would mean that narrow Send Road (A247) would be the main route for traffic leaving the M25 and A3. It is already crowded and vulnerable to traffic jams. Further traffic from this development would result in permanent gridlock. It simply would not work.

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

Attached documents:

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Comment ID: PSLPS16/560  Respondent: 15206497 / Vivien Bancroft  Agent:

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

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

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

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I OBJECT to policy A44 which would see 40 homes and two travellers' pitches on land west of Winds Ridge and Send Hill. This was again a NEW site NOT included in 18 draft and therefore has NOT been consulted on previously. Once again this is Green Belt land partly containing unsafe landfill. Access is by a narrow lane which could never take the volume of traffic that would ensue from traveller's pitches.

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

Attached documents:

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Comment ID: PSLPA16/428  Respondent: 15206721 / Beverly Saidman  Agent:

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

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

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

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

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

Attached documents:

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Comment ID: PSLPS16/562  Respondent: 15206721 / Beverly Saidman  Agent:

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

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

| 1. | I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt. |
| 1. | I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency. I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect. |

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

Attached documents:

Comment ID: PSLPP16/1216  Respondent: 15206721 / Beverly Saidman  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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

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

| 1. | I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs. |

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

Attached documents:

Comment ID: PSLPP16/1217  Respondent: 15206721 / Beverly Saidman  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

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

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

Attached documents:

Comment ID: PSLPP16/1219  Respondent: 15206721 / Beverly Saidman  Agent:

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

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

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

1. I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
2. I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

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

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

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

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

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

Attached documents:

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

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

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

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

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

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

Attached documents:

Comment ID: PSLPP16/1225  Respondent: 15207169 / Trevor Knight  Agent:

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

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

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

You will have seen a thorough analysis of the objections to the Local Plan from Mr David Roberts of West Horsley. I have read the details of this document and would like to register my objections to the plan for the same reasons are set out in that document.

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

Attached documents:

Comment ID: PSLPS16/575  Respondent: 15207425 / Elizabeth Davey  Agent:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

10) I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.
After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

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

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

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

Attached documents:

Comment ID: PSLPS16/2654  Respondent: 15207425 / Elizabeth Davey  Agent:

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

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

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

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

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

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored. Further, it is an inter generational covenant (enshrined in primary legislation) to protect green areas in perpetuity. It is the envy of the world and the proposals to raid these precious areas is nothing short of outrageous.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.
- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
2. The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.

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

4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).

5. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RH5 Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

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

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

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

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

- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

- I would point out that the number of new homes has been based on pre-Brexit projections for economic and population growth, including migration which now needs to be revised downwards, possibly quite seriously.

- Most of the borough's infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. The plan's commitment to build housing across the Guildford countryside will mean either major infrastructure investment, which no one will believe will happen and for which there are no funds, or else a catastrophic collapse in transport, educational, medical, energy, water and communication services.

- Finally I object to the proposal to build 533 houses on 6 sites in the Horsleys as it is plainly both excessive in absolute terms and disproportionate relative to the rest of the It will destroy the rural character of these communities.

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

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

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

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

I object to the congestion that such development of this magnitude would cause to local village roads (Policy 11) There is too much traffic in the villages of Ripley, Send and Clandon already and the rural roads are narrow, in need of repair and without footpaths in many places. More houses will mean dangerous traffic conditions. Pity the poor cyclists as well as other road users.

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

Attached documents:

Comment ID: PSLPP16/1241  Respondent: 15207457 / Robert Erhardt  Agent:

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

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

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

I object to the congestion that the proposed development would cause to the trunk roads A3 and M25 (Policy 12) Any proposed development should be preceded by infrastructure improvements. It is foolish to think that funds may be allocated in the future and local communities would be directly adversely affected.

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

Attached documents:

Comment ID: PSLPP16/1243  Respondent: 15207457 / Robert Erhardt  Agent:

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

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

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

I object to not protecting the Green Belt (Policy P2) I object to removing Ripley, Send and Clandon, Wisley Airfields and Garlick’s Arch from the Green Belt. Such a change can never be reversed and there are no exceptional circumstances to require such action. There are other areas more suitable for accommodating the required housing, not in the Green Belt and consideration should be given to these sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/1240  Respondent: 15207457 / Robert Erhardt  Agent:

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

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

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

I object to the Local Plan (Policy S1) as the development proposed is excessive for the area. The proposed 13,860 new houses is such an overdevelopment it will adversely affect local communities. As well, there is insufficient rail access and a limited bus service to cater for the increased population. Private cars will be a necessity and cause congestion. Schools and other infrastructure are also insufficient.

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

Attached documents:

Comment ID: PSLPP16/1248  Respondent: 15207489 / Linda O'Cain  Agent:

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

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

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

I object to the traffic congestion that will ensue on trunk roads A23 K M25 (Policy 12) if development occurs. It is the sensible option to improve road capacity prior to development of any area. If road capacity is not adequate development should not proceed.

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

Attached documents:
I object to not protecting the Green Belt (policy P2) As a regular visitor to Ripley and surrounding areas I value the unbuilt areas that give this part of England it's character. Once the Green Belt is encroached on by development it can never be retrieved. There are more suitable areas for housing.

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

Attached documents:

Comment ID: PSLPP16/1246  Respondent: 15207489 / Linda O'Cain  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

I object to the LocalPlan as the development proposed is excessive for the area and not sustainable (Policy S1) There is not sufficient public transport to cater for any of the residents of the proposed 13,860 new houses and certainly not sufficient capacity on local roads of any size for their cars. Local communities function currently well and will be adversely affected by development of this magnitude.

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

Attached documents:

Comment ID: PSLPA16/436  Respondent: 15207521 / June Windsor  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Ripley
I strongly object to the building plans in the Ripley and surrounding countryside areas.

Traffic is a big problem for our village which will get much worse with these proposals There is no evidence that we need all the proposed building.

There are no new schools planned nor provision for more Doctors Surgeries.

I object to the 2016 DRAFT LOCAL PLAN. And urge you to reconsider.

A very concerned Ripley resident.

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

Attached documents:

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Comment ID: PSLP16/1250  Respondent: 15207553 / Supergonk (Ben Ward)  Agent:

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

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

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

We are a very small company that offers co-working facilities to technology professionals in the Guildford area. We are based on the Surrey Research Park, and work within a large network of independent games developers and creative tech professionals that that are based in wider Guildford area.

This network comprises mainly of young people, they are not well paid, they take risks with their time to drive the games and technology sectors forward in the area, and they are not close to the planning processes that defines the future of Guildford.

I am writing you to say that common issues with this group of young people is the lack of accessible and affordable housing.

I understand that the local plan that is now subject to a consultation has land allocations for housing across range of prices and accessibility and, for those companies that will emerge from our network, land for the growth of employment, as well as improvements to the infrastructure to support development.

Based on this understanding I am writing to support this plan, and encourage the council to do all they to improve access for young people to affordable housing.

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

Attached documents:

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Comment ID: PSLPP16/1256  Respondent: 15207713 / Amec Foster Wheeler (Robert Deanwood)  Agent:

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

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

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

National Grid has appointed Amec Foster Wheeler to review and respond to development plan consultations on its behalf. We have reviewed the above consultation document and can confirm that National Grid has no comments to make in response to this consultation.

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

Attached documents:

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<tr>
<th>Comment ID:</th>
<th>PSLPS16/582</th>
<th>Respondent:</th>
<th>15207777 / M Henin</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A25</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

We live in New Inn Lane, Burpham and are extremely concerned about the Proposed Local Plan for Gosden Hill.

There is no evidence supporting the need to build such a high number of extra houses in the area. The scale of the building project is out of proportion compared to previous year figures (693 a year, more than double the previous figure given in 2012 of 322) and out of line with the current political and economic uncertainty which puts people off buying.

The choice of the location of Gosden Hill is also surprising.

Given the lack of any reliable bus routes to Guildford centre, Burpham is not likely to be attractive to working people with no children. The proposed new railway station in Merrow would not help. Commuters who usually travel to London wish to join the fast lines from either Guildford centre or Woking. The incredibly slow trains which run through our currently picturesque villages will not suit busy commuters.

People as always will travel by car. The proposed tunnel would only partly address the traffic problems. The levels of pollution will become alarming. The loss of the green belt will have long-lasting and irreversible consequences for residents’ health and well-being.

Should a credible case for new housing be made, it is not clear why Burpham should bear the grunt of all the extra houses.

Already the construction of Aldi has created daily traffic jams at the end of New Inn Lane. Impatient motorists now fail to stop at the pelican crossing in New Inn Lane, endangering pedestrians and especially children walking to school.

The proposed new 4 way junction at Burnt Common will not alleviate Burpham’s traffic problems as has been claimed. The traffic situation, already dire in Burpham will be made far worse and to the detriment of everyone, residents and road users alike.
Finally, the heavily subscribed local schools will not be able to accommodate such an increase in population. It is irresponsible to push such a large scale project forward without having FIRST built new schools (not to mention bus lines, surgeries etc).

In conclusion, the proposed draft local plan, without any evidence for the need for extra houses on such a large scale, proposes to put the health of residents and the safety of our children in jeopardy.

On grounds of health and safety alone at the very least, it should therefore NOT GO AHEAD.

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

**Attached documents:**

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<th>Comment ID: PSLPA16/440</th>
<th>Respondent: 15207809 / Colin Rugless</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

I would wish to make the following comments in respect of the Plan:

I consider the local infrastructure completely inadequate to accommodate the number of properties that are being proposed.

Parking in East Horsley is already difficult and at both Horsley and Effingham stations commuters now often have to park on the roads or, in the case of Horsley, down by the community centre.

The surgery in Horsley is already overloaded and it can take weeks to get an appointment with ones own GP.

School places are simply not available.

I also fail to understand how changing the boundaries can be allowed when this is a deliberate attempt to build on green-belt land, which is supposed to be protected.

The idea of 2000 homes at Wisley must be a joke! 3000 extra cars and 5000 more people.

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

**Attached documents:**

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<th>Comment ID: PSLPP16/1261</th>
<th>Respondent: 15207841 / Jill Clements</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I strongly object to the above plan which will ruin our village and spoil the view across the green. (Shalford settlement boundary)

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

Attached documents:

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<th>Comment ID:</th>
<th>PSLPA16/442</th>
<th>Respondent:</th>
<th>15208289 / M. J Payne</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

I list below my objections to parts of the local plan and request that they are brought to the attention of the Inspector.

1. Policy P2 SEND SHOULD NOT BE REMOVED FROM THE GREEN BELT

   I object to the plans to remove land in the villages of Send, Ripley and Clandon from the Green Belt as this would allow the areas to be developed and the villages would lose their individual identity and the whole area become an urban sprawl joining Guildford and Woking. With the middle school combining with the first school this autumn, it would seem likely that the middle school site would be developed which does not appear in the Plan. This is a concern due to the extra traffic and the problem that would cause to Send Hill and Send Road.

1. EVIDENCE

   I object as data presented by GBC is suspect and estimates of required housing exaggerated and strongly object to the Green Belt being used for housing that may not be needed.

5 GBC HAVE NOT FOLLOWED CORRECT PROCESS

   I object to the significant changes in the sites suggested and including new sites at the last minute. The proposals for housing requirements have gone up and down in recent years and it is not acceptable to try and use Regulation 19 rather than the full consultation.

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

Attached documents:

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<tr>
<th>Comment ID:</th>
<th>PSLPS16/586</th>
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<th>15208289 / M. J Payne</th>
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<td>Document:</td>
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<td>Comment ID: PSLPS16/585</td>
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I object to the size of this development on Green Belt land as it would have the affect of practically joining Ripley and Send together. This seems to have replaced the Burnt Common site which together with Slyfield would have been more suitable for some industrial development. The new 4-way interchange onto the A3 at Burnt Common to serve this development would be a disaster for Send and the traffic it would generate on the A247 Send Road through the village. This would become an even busier through route to Woking on an already, at times, gridlocked road, taking many heavy lorries, with the access to two schools directly in to this traffic.

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

Attached documents:

<table>
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<th>Comment ID: PSLPA16/444</th>
<th>Respondent: 15208353 / Janet Green</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
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</table>

I list below my objections to parts of the local plan and request that they are brought to the attention of the Inspector.

1. Policy A44. 1.9ha LAND WEST OF WINDS RIDGE AND SEND HILL

I object to this Policy as this site has not previously been included and has not been consulted upon.

This land is part of the Green Belt and in past years has been a large land fill site and is still vented which would make it unsafe. The Travellers Pitches are inappropriate due to insufficient access due to the narrow, at times single track, country lane. Any extra traffic would make this lane unsafe and affect the peace and tranquillity of the Cemetery opposite which itself has been enlarged very recently.

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

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

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

11) I OBJECT TO the lack of immediate provision for new schools

12) I OBJECT TO the lack of any immediate provision for Doctors Surgeries.

This plan effectively merges all villages along the A3 from the M25 to the Hogs Back with no provision for any improvements to either the A3 or local roads.

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

Attached documents:

Comment ID: PSLPA16/443  Respondent: 15208353 / Janet Green  Agent:

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

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

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

10) I OBJECT TO the lack of evidence for the alleged housing need numbers

2) Evidence

GBC have failed to provide sound evidence in terms of the the Employment Land Needs Assessment 2015 (ELNA) which shows an 80% reduction in employment space from the previous ELNA carried out by GBC in 2013. This means the industrial space at Burnt Common is no longer needed. Housing numbers from the Strategic Housing Market Assessment 2015 (SHMA) are highly questionable. The number of foreign students has been wrongly used to inflate the need. The required 13,860 houses in the local plan is exaggerated. If the population is to grow by some 20,000 in the plan period, we actually need 8,000 homes (based on an average of 2.5 persons per home). The Green Belt does not need to be built over. 50% of new homes needed could be built on brownfield sites. GBC’s Transport Assessment was not even available to councillors for the vote taken on 24th May, being published on 6th June. Infrastructure overload has received scant attention.

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

Attached documents:

Comment ID: PSLPA16/445  Respondent: 15208353 / Janet Green  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send
3) Policy P2. Send should not be removed from the Green Belt.

Send provides a buffer between Woking and Guildford. The particularly vulnerable areas of land being taken out of the Green Belt include: the land behind the school which includes playing fields and woodland, the land to the right of Cartbridge by the River Wey Navigation up to the new boundary fence with Vision Engineering and land to the left of Cartbridge going up to the old depot on the Wey Navigation.

Further points;

Huge development objectives like these limit ability to mitigate climate change and weather events like flooding.

Environmental health will suffer through increased air pollution, as well as increase both noise and light pollution.

Cyclists and pedestrians will be impacted by the increased traffic congestion.

Healthcare, social welfare and policing will be further stretched.

Surrey County Council is already proposing to reduce the number of bus services serving Ripley, if these plans were to go ahead how would they possibly provide essential bus services for the added population.

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

Attached documents:

Comment ID: PSLPS16/587  Respondent: 15208353 / Janet Green  Agent:

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

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

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

2) I OBJECT TO site A43 Garlicks Arch

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

Attached documents:

Comment ID: PSLPS16/591  Respondent: 15208353 / Janet Green  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
3) I OBJECT TO site A43a the on and off ramp at Clandon- this will increase traffic problems in the villages not help them!

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

Attended documents:

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Comment ID: PSLPS16/588  Respondent: 15208353 / Janet Green  Agent:

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

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

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

4) Policy A43. 30 ha Land at Garlick's Arch, Burnt Common, designated for 400 houses and 7,000 sq m of industrial and warehousing.

There is no need for any more houses on top of the 13,860 already proposed for the borough. This site is NEW and was not included in the Regulation 18 draft and has NOT been consulted upon previously. It is Green Belt permanently protected by the NPPF which prevents the merging of settlements. There are no exceptional circumstances. The site has a particular conservation sensitivity since it is covered in ancient woodland. Trees which existed in the 16th Century would be endangered. The proposed industrial development of 7000sq m is simply not required since the latest (ELNA) shows a reduction of 80% in required floor space from the previous draft plan. If there is a need for 7,000 sq m of industrial space it should be at Slyfield. A new 4 way interchange onto the A3 at Burnt Common to serve this development would be disastrous for Send. Send Road (A247) would be gridlocked all day. Send would be the through route to Woking for traffic leaving the M25 and the A3, the proposed 2,000 houses at Wisley and the 2,000 houses at Burpham. Send cannot take it.

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

Attended documents:
4) Policy A44.1.9 ha Land west of Winds Ridge and Send Hill designated for 40 homes and 2 travellers pitches.

This site is **NEW** and was **NOT** included in the regulation 18 draft and has **NOT** been consulted upon previously. Development for housing is inappropriate due to its permanent Green Belt status and high quality Green Belt amenity within an area of beautiful countryside which would be spoilt by any development. The subsoil of the existing site contains documented unsafe land fill waste which is currently vented. The proposal to include 2 Travellers Pitches is inappropriate due to the narrow width single track country road providing insufficient access to the site.

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

Attached documents:

Comment ID: PSLPS16/589  Respondent: 15208353 / Janet Green  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

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

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

4) I OBJECT TO site A45 The Talbot- this is over development in a conservation area

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

Attached documents:

Comment ID: PSLPS16/590  Respondent: 15208353 / Janet Green  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

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

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

5) I OBJECT TO site A57 The Paddocks- this is unlawful

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

Attached documents:

Comment ID: PSLPP16/1273  Respondent: 15208353 / Janet Green  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like my comments to be seen by the Inspector.

1) I OBJECT TO all erosion of the Green Belt
6) I OBJECT TO any 'in setting' (i.e removal) of any villages from the Green Belt

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

Attached documents:

Comment ID: PSLPP16/1274  Respondent: 15208353 / Janet Green  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

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

7) I OBJECT TO to disproportionate amount of development in one area of the Borough

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

Attached documents:

Comment ID: SQLP16/292  Respondent: 15208353 / Janet Green  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

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

8) I OBJECT TO the limited consultation period
9) I OBJECT TO the last minute inclusion of new sites with less than 2 weeks notice

Furthermore
1) Guildford Borough Council (GBC) have not followed the correct process.
Since 2014 GBC has changed every major site in Send proposed for development and now just added a massive new road junction. The 2014 proposal for 430 houses went down in April 2016 to 185 and has now gone up again to 485. These significant changes require another full consultation under Regulation 18, not the short cut of Regulation 19 which GBC are trying to get away with. This invalidates the whole process.

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This plan effectively merges all villages along the A3 from the M25 to the Hogs Back with no provision for any improvements to either the A3 or local roads.

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Send provides a buffer between Woking and Guildford. The particularly vulnerable areas of land being taken out of the Green Belt include; the land behind the school which includes playing fields and woodland, the land to the right of Cartbridge by the River Wey Navigation up to the new boundary fence with Vision Engineering and land to the left of Cartbridge going up to the old depot on the Wey Navigation.

Further points;

Huge development objectives like these limit ability to mitigate climate change and weather events like flooding.

Environmental health will suffer through increased air pollution, as well as increase both noise and light pollution.

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

Attached documents:

Comment ID: PSLPS16/596  Respondent: 15208417 / Colin Green  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

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

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Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

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

Attached documents:

Comment ID: PSLPP16/1277  Respondent: 15208417 / Colin Green  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Attached documents:

Comment ID: PSLPP16/1279  Respondent: 15208417 / Colin Green  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

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

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

Attached documents:

Comment ID: SQLP16/293  Respondent: 15208417 / Colin Green  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

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

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

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<td>2) Evidence</td>
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GBC have failed to provide sound evidence in terms of the the Employment Land Needs Assessment 2015 (ELNA) which shows an 80% reduction in employment space from the previous ELNA carried out by GBC in 2013. This means the industrial space at Burnt Common is no longer needed. Housing numbers from the Strategic Housing Market Assessment 2015 (SHMA) are highly questionable. The number of foreign students has been wrongly used to inflate the need. The required 13,860 houses in the local plan is exaggerated. If the population is to grow by some 20,000 in the plan period, we actually need 8,000 homes (based on an average of 2.5 persons per home). The Green Belt does not need to be built over.
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

3) I OBJECT TO site A43a the on and off ramp at Clandon- this will increase traffic problems in the villages not help them!

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Attached documents:

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Comment ID: PSLPS16/601  Respondent: 15208513 / Lauren Green  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

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

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

4) I OBJECT TO site A45 The Talbot- this is over development in a conservation area

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

Attached documents:

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Comment ID: PSLPS16/602  Respondent: 15208513 / Lauren Green  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

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

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

5) I OBJECT TO site A57 The Paddocks- this is unlawful

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

Attached documents:

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Comment ID: PSLPP16/1281  Respondent: 15208513 / Lauren Green  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

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Comment ID: PSLPP16/1282  Respondent: 15208513 / Lauren Green  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

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

7) I OBJECT TO to disproportionate amount of development in one area of the Borough

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

Attached documents:

Comment ID: SQLP16/294  Respondent: 15208513 / Lauren Green  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

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Comment ID: PSLPA16/453  Respondent: 15208545 / Charlotte Green  Agent:

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

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

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

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12) I OBJECT TO the lack of any immediate provision for Doctors Surgeries.

This plan effectively merges all villages along the A3 from the M25 to the Hogs Back with no provision for any improvements to either the A3 or local roads.

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Attached documents:

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Comment ID: PSLPA16/452  Respondent: 15208545 / Charlotte Green  Agent:

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

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

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

10) I OBJECT TO the lack of evidence for the alleged housing need numbers

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GBC have failed to provide sound evidence in terms of the the Employment Land Needs Assessment 2015 (ELNA) which shows an 80% reduction in employment space from the previous ELNA carried out by GBC in 2013. This means the industrial space at Burnt Common is no longer needed. Housing numbers from the Strategic Housing Market Assessment 2015 (SHMA) are highly questionable. The number of foreign students has been wrongly used to inflate the need. The required 13,860 houses in the local plan is exaggerated. If the population is to grow by some 20,000 in the plan period, we actually need 8,000 homes (based on an average of 2.5 persons per home). The Green Belt does not need to be built
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Attached documents:

Comment ID: PSLPA16/454  Respondent: 15208545 / Charlotte Green  Agent:

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

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

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3) Policy P2. Send should not be removed from the Green Belt.

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Attached documents:

Comment ID: PSLPS16/604  Respondent: 15208545 / Charlotte Green  Agent:

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

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

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Comment ID: PSLPS16/606  Respondent: 15208545 / Charlotte Green  Agent: 

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

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4) Policy A44.1.9 ha Land west of Winds Ridge and Send Hill designated for 40 homes and 2 travellers pitches.

This site is NEW and was NOT included in the regulation 18 draft and has NOT been consulted upon previously. Development for housing is inappropriate due to its permanent Green Belt status and high quality Green Belt amenity within an area of beautiful countryside which would be spoilt by any development. The subsoil of the existing site contains documented unsafe land fill waste which is currently vented. The proposal to include 2 Travellers Pitches is inappropriate due to the narrow width single track country road providing insufficient access to the site.

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

Attached documents:

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Comment ID: PSLPS16/607  Respondent: 15208545 / Charlotte Green  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

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

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

4) I OBJECT TO site A45 The Talbot- this is over development in a conservation area

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

Attached documents:

---

Comment ID: PSLPS16/608  Respondent: 15208545 / Charlotte Green  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

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

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

5) I OBJECT TO site A57 The Paddocks- this is unlawful

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

Attached documents:

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Comment ID: PSLPP16/1283  Respondent: 15208545 / Charlotte Green  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

I would like my comments to be seen by the Inspector.

1) I OBJECT TO all erosion of the Green Belt

6) I OBJECT TO any 'in setting' (i.e removal) of any villages from the Green Belt

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

Attached documents:

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<th>PSLPP16/1285</th>
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7) I OBJECT TO to disproportionate amount of development in one area of the Borough

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

Attached documents:

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<th>Comment ID:</th>
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</table>

8) I OBJECT TO the limited consultation period

9) I OBJECT TO the last minute inclusion of new sites with less than 2 weeks notice

Furthermore

1) Guildford Borough Council (GBC) have not followed the correct process.
Since 2014 GBC has changed every major site in Send proposed for development and now just added a massive new road junction. The 2014 proposal for 430 houses went down in April 2016 to 185 and has now gone up again to 485. These significant changes require another full consultation under Regulation 18, not the short cut of Regulation 19 which GBC are trying to get away with. This invalidates the whole process.

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

Attached documents:

Comment ID: PSLPS16/609  Respondent: 15210113 / Miriam Macdonald  Agent:

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

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

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

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:
- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt increase tail backs on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

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

Attached documents:

Comment ID: slp172/255  Respondent: 15210113 / Miriam Macdonald  Agent:

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

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

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

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:
  - disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
  - directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

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

Attached documents:

Comment ID: PSLPS16/615  Respondent: 15211809 / Shirley Butcher  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

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

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:
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- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt increase tail backs on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

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

Attached documents:

Comment ID: PSLPA16/2843  Respondent: 15212129 / Amanda Susan Sturdee  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Wood Street Village

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

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

Please register my objection to the GBC's proposed plans for housing to be developed on green belt land in the village of Wood Street. Why this is being considered in an area of outstanding natural beauty, thereby robbing us and future generations of enjoyment of this beautiful space, is quite unacceptable and frankly unbelievable.

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

Attached documents:
<table>
<thead>
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<th>Comment ID: PSLPS16/617</th>
<th>Respondent: 15212129 / Amanda Susan Sturdee</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26</td>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:
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- result in rat-running through local roads
- add to Guildford's pollution.

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

Attached documents:

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<th>Comment ID: pslp172/1773</th>
<th>Respondent: 15212129 / Amanda Susan Sturdee</th>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:
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- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

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

Attached documents:

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<th>Comment ID: PSLPS16/619</th>
<th>Respondent: 15212641 / Janet Olivier</th>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:
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- result in rat-running through local roads
- add to Guildford's pollution.

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

Attached documents:

Comment ID: PSLPS16/620  Respondent: 15212993 / David Franks  Agent:

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

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

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

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:
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- result in rat-running through local roads
- add to Guildford's pollution.

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

Attached documents:

Comment ID: PSLPS16/621  Respondent: 15213025 / Teresa Grobler  Agent:

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

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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- increase tail backs on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

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

Attached documents:

Comment ID: PSLPS16/628  Respondent: 15215553 / Justine Curlis  Agent:

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

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

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

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:
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- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tail backs on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

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

Attached documents:

Comment ID: PSLPS16/629  Respondent: 15215585 / Alicia Hope Tate  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:
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- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt increase tail backs on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford’s pollution.

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

Attached documents:

Comment ID: PSLPS16/630  Respondent: 15215617 / Richard K Reads  Agent:

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

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

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

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:
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- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt increase tail backs on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford’s pollution.

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

Attached documents:

Comment ID: PSLPS16/631  Respondent: 15215745 / Marie Claire Bodenham  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:
- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

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

Attached documents:

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<th>Respondent: 15215809 / Shelia Smethurst</th>
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We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:
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- result in rat-running through local roads
- add to Guildford's pollution.

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

Attached documents:

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</table>
I object to the complete lack of consideration of the impact of these proposals on highways, education, transport or medical services.

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

Attached documents:

Comment ID: PSLPP16/1287  Respondent: 15215841 / Andrew Boyce  Agent:

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

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

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

I am writing to express my opposition to the draft local plan currently under consideration, namely:

I object to the erosion of the greenbelt

I object to the removal of any villages from the Greenbelt

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

Attached documents:

Comment ID: PSLPP16/1288  Respondent: 15215841 / Andrew Boyce  Agent:

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

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

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

I object to the massing of these new housing proposals in one area of the borough

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

Attached documents:

Comment ID: SQLP16/298  Respondent: 15215841 / Andrew Boyce  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

I object to the lack of proper consultation

I object to the last minute inclusion of sites

I would like to have a copy of the councillors voting record on this matter - please can you direct me to where I can find this?

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

Attached documents:

Comment ID: PSLPS16/633  Respondent: 15215905 / P Harrison  Agent:

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

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

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

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:
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- result in rat-running through local roads
- add to Guildford's pollution.

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

Attached documents:

Comment ID: PSLPS16/634  Respondent: 15216001 / Philip Smethurst  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:
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- add to Guildford's pollution.

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

Attached documents:

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Comment ID: PSLPS16/635  Respondent: 15216033 / F Bodenham  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

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

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:
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- add to Guildford's pollution.

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

Attached documents:

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Comment ID: PSLPS16/637  Respondent: 15216097 / Joan Brand  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3951   Respondent: 15216129 / Timothy Hewlett   Agent: 

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

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

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

I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no schedule for Garlick’s Arch (A43), so the Plan takes no account of the infrastructure required for this site. It is therefore not fit for purpose.

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

Attached documents:

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Comment ID: PSLPA16/3922   Respondent: 15216129 / Timothy Hewlett   Agent: 

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

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

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

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

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

Attached documents:
Comment ID: PSLPA16/3950  Respondent: 15216129 / Timothy Hewlett  Agent:

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

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

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

I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)
The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans.

But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on the Plan.

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

Attached documents:

Comment ID: PSLPA16/4332  Respondent: 15216129 / Timothy Hewlett  Agent:

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

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

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

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

The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans.

But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on the Plan.

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

Attached documents:

Comment ID: PSLPA16/4331  Respondent: 15216129 / Timothy Hewlett  Agent:

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

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

OBJECTIONS TO GUILDFORD BOROUGH PROPOSED SUBMISSION LOCAL PLAN EAST & WEST HORSLEY (JUNE 2016)

I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2016).

These are my main reasons are…

I object to the Local Plan as the following development proposed is not sustainable (Policy S1)

At least 148 more houses in East Horsley. At least 385 more houses in West Horsley.

I further object to both villages to be taken out of the Green Belt. The new boundary, (called the in-setting boundary) extends the old settlement boundary and includes some fields and open spaces. This means that Kingston Meadows (by East Horsley Village Hall) is included inside the insetting boundary – despite being a valuable green space. Horsley Tennis & Cricket club at the end of Pennymead Drive is also inside the insetting boundary.

This is totally unacceptable. I object to not protecting the Green Belt (Policy P2)

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

Attached documents:

Comment ID: PSLPS16/7365  Respondent: 15216129 / Timothy Hewlett  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction

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

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

RIPLEY, SEND AND CLANDON

Please find attached my letter objecting to the inclusion of the above locations in the revised draft Guildford Borough Council Local Plan.

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

Attached documents:

Comment ID: PSLPS16/638  Respondent: 15216129 / Timothy Hewlett  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
I OBJECT TO THE DRAFT LOCAL PLAN FOR THE FOLLOWING KEY REASONS:

1)  

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

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

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

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

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

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

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

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

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

2. I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

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

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

Attached documents:

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<th>Comment ID: PSLPS16/6086</th>
<th>Respondent: 15216129 / Timothy Hewlett</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

I OBJECT TO THE DRAFT LOCAL PLAN FOR THE FOLLOWING KEY REASONS:

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

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

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

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

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   a. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   b. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   c. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by
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d. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
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f. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity
8) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCl).
9) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
2
10) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.
11) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

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

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

I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.
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I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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

I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

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

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

Garlick’s Arch is protected from development as Green Belt. There are no exceptional circumstances which allow for it’s removal from the Green Belt (Policy P2). Central Government state clearly that housing need is not an exceptional circumstance.

The Plan states the preference is to use of previously developed land, but GBC have removed a brownfield site at Burnt Common replaced it with Garlick’s Arch.

The site is not appropriate because:
• There is no sustainable transport infrastructure.
• The site is liable to frequent flooding
• The site has Ancient woodland and is a wildlife habitat, but no wildlife report for the site is in the Plan.
• There are no plans to improve local schools, medical or utilities to cope.

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

Attached documents:

Comment ID: PSLPS16/7363  Respondent: 15216129 / Timothy Hewlett  Agent:

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

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

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

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

North facing ramps to the A3 at Burnt Common would be a disaster for local communities, which do need to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic. E.g. all traffic from London/M25 to Woking would go through Burnt Common, Send and Old Woking. This is not sustainable as this cannot be improved.

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

Attached documents:

Comment ID: PSLPP16/16402  Respondent: 15216129 / Timothy Hewlett  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3).

The Garlick’s Arch (A43) proposal would double the built area in the locality, and would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees.

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

Attached documents:

Comment ID: PSLPP16/16404  Respondent: 15216129 / Timothy Hewlett  Agent:

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

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

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

I object to the employment strategy and impact at Garlick’s Arch (A43) (Policies E2 and E5).

There is no need for new industrial sites at Garlick’s Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000 sq m proposed. That site was removed from the Plan without any reasoning.

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

Attached documents:

Comment ID: PSLPP16/16399  Respondent: 15216129 / Timothy Hewlett  Agent:

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

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

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

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

There is too much traffic in our villages already and this plan will cause more congestion in Ripley, Send and Clandon, with no plan to improve that.

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

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

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

I object to the lack of proper infrastructure planning for sites (Policy I1)

The Plan does not identify adequate infrastructure improvements to support the huge scale of development, especially at Garlick’s Arch (A43) which has no infrastructure projects in the Infrastructure Schedule to support it. Local services, utilities and sewerage, doctors etc. are at or close to capacity.

There are no plans to improve the capability of the medical and police/emergency services to cover the 5000+ houses in the north east of the borough.

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

Attached documents:

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

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

I object to the lack of proper infrastructure planning for sites (Policy I1)

The Plan does not identify adequate infrastructure improvements to support the huge scale of development envisaged in the plan. Local services, utilities and sewerage, doctors etc. are at or close to capacity.

There are no plans to improve the capability of the medical and police/emergency services to cover the huge scale of development envisaged in the plan

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

Attached documents:

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<th>Comment ID: PSLPP16/16406</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2</td>
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I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2).

The A3 or M25 would have to be improved before any development is done. Highways England has no plans to even start considering improving the A3 before 2020. Clearly no real improvements are possible in the timeframe of this Plan so the developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), should not take place.

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

**Attached documents:**

---

I object to poor air quality concerns (Policy I3).

The huge developments being proposed, particularly in the north east of the borough will lead to considerable further congestion and to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

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

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

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

Attached documents:

Comment ID: PSLPP16/16398  Respondent: 15216129 / Timothy Hewlett  Agent:

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

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

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

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

I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick’s Arch (A43).

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

Attached documents:

Comment ID: PSLPP16/16400  Respondent: 15216129 / Timothy Hewlett  Agent:

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

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

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

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

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

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

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<tr>
<td>I object to the Local Plan as the development proposed is not sustainable (Policy S1)</td>
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<tr>
<td>13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve infrastructure for Garlick's Arch.</td>
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<th>Respondent: 15216129 / Timothy Hewlett</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
I object to the Borough Wide Strategy (Policy S2)

GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

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

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

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

Attached documents:

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**Comment ID:** SQLP16/489  **Respondent:** 15216129 / Timothy Hewlett  **Agent:**

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

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

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

The proposed submission local plan strategy and sites is wholly inadequate and has a menace to the well being of the people who live in those areas where these unwanted developments are proposed.

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

Attached documents:

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**Comment ID:** SQLP16/490  **Respondent:** 15216129 / Timothy Hewlett  **Agent:**

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

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

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

To make this document legally compliant it should be scrapped and the people involved in its creation should be subject to a criminal investigation for corruption.

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

Attached documents:
Comment ID: SQLP16/491  Respondent: 15216129 / Timothy Hewlett  Agent:

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

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

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

The plan is wholly unsound, it should be scrapped and a proper national plan be created for housing needs before any proposals are made at local level for development.

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

Attached documents:

Comment ID: SQLP16/492  Respondent: 15216129 / Timothy Hewlett  Agent:

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

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

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

Any duty to cooperate should only come into force when the public officials who have created the plan, and the greedy developers who they are hand in glove with have been properly investigated to find out the extent of corruption involved in the creation of this plan.

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

Attached documents:

Comment ID: SQLP16/493  Respondent: 15216129 / Timothy Hewlett  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)
The Police should be investigating the public officials and the greedy, unscrupulous developers involved to ascertain the level of corruption involved in the development of this unwanted plan.

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

Attached documents:

Comment ID: pslp172/4240  Respondent: 15216129 / Timothy Hewlett  Agent:

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

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

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

RE: GUILDFORD BOROUGH COUNCIL DRAFT LOCAL PLAN

The submission plan for the above is completely unfit for purpose, containing as it does a number of fundamental errors. As well as this I find the evidence base in the plan to be almost unbelievably poor and I find it hard to believe that this is the work of professional people. The lack of clarity is worrying and reports that I have received regarding the information being difficult to access for people with poor internet connections leads me to wonder if there is an ulterior motive that has led to this difficulty being deliberately put in the way of people as these try to assess this important matter.

I continue to object in the strongest possible terms to the totally unjustified inclusion of policy A35, Three Farms Meadows in the draft Local Plan for the following reasons:

Transport

(Matters that make the site completely unsuitable for inclusion in the local plan):

Three Farms Meadows is adjacent to the most congested stretch of strategic road network in Surrey and close to one the most congested junction in the country (J10 of the M25 and the A3) and the amount of traffic using this area of road it set to increase significantly. No amount of changes to that junction in the future will change these facts. Because of this, any egress onto A3 from Three Farms Meadows at any point will be extremely dangerous and cannot be allowed.

Local roads are already at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks and so on). The roads in the immediate area around Three Farms Meadows are extremely narrow and no responsible plan should seek to increase traffic on these roads. I challenge any Guildford Borough Council employee or elected official to drive around these local roads with me to see how suitable they are.

Any existing or new public transport provision such as bus services to/from Guildford or destinations towards London has to, and will have to negotiate these over-crowded major and minor roads and will therefore be unreliable and subject to frequent delays. This has always been the case with bus services in the area around Three Farms Meadows – as anyone (myself included) who has previously had experience of Green Line / London Country 715 route bus services can testify to. Any new bus services to Horsley or anywhere else will impact the safety of the local road network and lead to road traffic accidents as the lanes are not wide enough to accommodate buses. Again, I challenge any Guildford Borough Council employee or elected official to drive around these local roads with me to see how suitable they are.

I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification whatsoever.
Finally, on transport, I would point out that Three Farms Meadows is further from railway stations than any other identified strategic site in the local plan. These railway stations are visited by trains that are already extremely overcrowded and no there is no short term, medium term of long term rail plan to overcome this overcrowding. I challenge any Guildford Borough Council employee or elected official to drive to these railway stations with me to see how realistic it is to drive to them and to see the car parking provision at these stations.

Finally, on transport, I would point out that Three Farms Meadows is further from railway stations than any other identified strategic site in the local plan. In any case, these stations are visited by trains that are already extremely overcrowded and no there is no short term, medium term of long term rail plan to overcome this overcrowding. Car parks at all of these railway stations are already full. How can anyone possibly think that the flood of additional vehicle from Three Farms Meadows would do anything but add to this parking problem.

**Environment**

(Matters that make the site completely unsuitable for inclusion in the local plan):

I object to the increased area of the site as this now abuts additional heritage assets, including Upton Farm and Bridge End House negatively impacting the setting of these buildings and the wider Ockham Conservation Area, all of which together make a unique and environment – so close to Greater London. These changes to the site boundaries are not identified correctly on the plan (Appendix H p16). As well as this I object to the fact that the increased area, being on the south of the site facing the Surrey Hills Area of Outstanding Natural Beauty will increase the negative impact of the views from the Area of Outstanding Natural Beauty. Unless this monstrous idea is withdrawn Guildford Borough Council will be responsible for an irredeemable act of environmental vandalism.

I object to paragraph 21 which “limits” (notice the use of double quotes) development in flood zone 2 and 3 as development should be excluded in flood zone 2 and 3 and I object to paragraph 22 as this does not reflect the impact of the buildings on the surrounding area.

I object to the disregard for the impact of in-combination development on the Thames Basin Heaths Special Protection Area, particularly the damage caused by nitrogen deposition and high pollution levels.

I object to the total lack of proper sewerage capacity for Three Farms Meadows in the local plan. How can supposedly professional people not make proper provision for this?

**Green Belt**

I object to the sinister removal of additional 3.1 ha from the green belt without any justification and I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact. This inclusion change can only be interpreted as a being undertaken in order to suit the needs of property developers and their aspirations to make money from this site regardless of the wishes of ordinary people. The inevitable and irreversible damage to the local environment that removal from Green Belt would entail would first and foremost the fault of Guildford Borough Council.

**The wishes of the local population, the lack of proper consultation and lack of due process**

(Matters that make the site completely unsuitable for inclusion in the local plan):

I object to the fact that the council has failed to remove this site from the local plan despite receiving thousands of objection from local residents and statutory consultees. I am appalled and puzzled that the Council continues to fly in face of the wishes of the local population in this matter and I can only assume that those persons who responsible for this plan have ulterior motives for including Three Farms Meadows in the plan.

I object to the significant modifications that have made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major. I object to the disturbing fact that there is no clear justification for the removal of one strategic site over site A35.
There are many other totally justified objections in addition to the above that I could make to this appalling plan and I have no doubt that many thousands of other people will make those points in their objections.

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

Attached documents:

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Comment ID: pslp172/5421  
Respondent: 15216129 / Timothy Hewlett  
Agent:

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

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

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

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RE: GUILDFORD BOROUGH COUNCIL DRAFT LOCAL PLAN

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(Matters that make the site completely unsuitable for inclusion in the local plan):

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Environment

(Matters that make the site completely unsuitable for inclusion in the local plan):

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There are many other totally justified objections in addition to the above that I could make to this appalling plan and I have no doubt that many thousands of other people will make those points in their objections.

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

Attached documents:

Comment ID: PSLPP16/1294  Respondent: 15216225 / Robert May  Agent:

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

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

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

The Institute of Directors has supported the development of Borough’s Local Plan from when the process started in for the original plan period from 2011 to 2030 and now for the period 2013 to 2033.

I understand that after a great deal of hard work and significant consultation by officers and Member, the Council has now published its pre submission draft version of the plan.

Guildford is an important town in Surrey in which the Institute has a significant number of Members

Particular features of the Plan which the Institute supports include:

• Improvement to the transport infrastructure in the town and in particular to the west of Guildford access from our County Hospital and the Surrey Research Park.
• Planning the provision of 13,680 houses across a range of tariffs and tenures in a number of strategic sites.
• The need to alter the green belt boundary to enable the provision of additional housing and choices of housing.
• It will help to support the educational base in the town
• It will provide additional land for the growth of employment
• There is a recognition in the plan of the importance of the employment base in the Borough and that this needs support if its strategic role is to be met fully
• It meets national planning policy
• It has been subject to intense scrutiny
• It has the support of the elected members of the council
• It is important in terms of putting in place a sound plan that can be used by the community at large, organisations such as the LEP and by business to support further investment in the town.

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

Attached documents:

Comment ID: PSLPA16/458  Respondent: 15216321 / Douglas Ollington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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<th>Comment ID: PSLPS16/641</th>
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1. I object to the lack of any evidence for the alleged housing need numbers

Nowhere in the Plan document can I find an explanation for why new houses need to be built other than the obvious that there are too many people. GBC should not punish local residents for the errors of central government in controlling population growth. Its residents will applaud GBC for standing up to central government.

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

Attached documents:

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1. I Object to the site A43 Garlick’s Arch

Garlick’s Arch is a 100 acre site of Green Belt and ancient woodland which should be protected.

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

Attached documents:
1. I Object to the site A45 The Talbot

This is an unreasonable overdevelopment in a conservation area. Ripley has already been impacted by at least 7 new housing developments in the past 3 years, without any improvements in roads, bus services, schools or medical centres.

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

Attached documents:

Comment ID: PSLPS16/640  Respondent: 15216321 / Douglas Ollington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

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

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

1. I Object to the site A57 The Paddocks

Planning application 09/P/01554 for site A57 was refused permission by GBC, and the appeal was rejected by the High Court in April 2013. Although the site’s continued occupation has been judged completely illegal, no enforcement action has yet been taken by GBC. GBC should take immediate action on the enforcement notices against illegal occupation. The Council should attach high priority to its planning enforcement role and should not stand idly by where there are flagrant breaches of planning rules, particularly on a prominent site like this in a Green Belt.

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

Attached documents:

Comment ID: PSLPP16/1296  Respondent: 15216321 / Douglas Ollington  Agent:

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

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

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

1. Disproportionate size of sites in relation to rural locations

I object to the allocation of land to the strategic sites of Garlicks Arch (Ripley/Send border), Gosden Hill (Clandon) and Wisley Airfield. The proposed development of these sites will have a disproportionate impact on the surrounding local villages. They will have a permanent and negative impact on each of these communities.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1299  Respondent: 15216321 / Douglas Ollington  Agent:

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

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

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

1. Congestion on the local village roads and lanes

Our villages are already suffering from severe congestion for much of the day. For example the Newark Lane and Rose Lane junction in the center of Ripley, which at peak hours, is regularly gridlocked due to the volume of traffic, made worse when Ripley High Street (B2215) is used as a detour/slip road when the A3 is jammed. I object to further development which will cause even greater congestion in and around our villages.

1. Unsuitability of our local roads for heavy vehicles and more traffic

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

1. Poor air quality concerns

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

1. Sites being planned in unsustainable locations

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

1. Parking issues in local villages caused by larger population

Many of the affected villages, such as Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems, to which I object.
1. Local healthcare facilities will be overwhelmed

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

1. Local schooling facilities will be overwhelmed

Without proper planning and a commitment to fund new schooling, existing schools will have their services stretched and overwhelmed. Many of these services are already at capacity.

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

Attached documents:

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Comment ID: PSLPP16/1298  Respondent: 15216321 / Douglas Ollington  Agent:

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

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

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

1. Congestion on the A3 and M25 trunk roads

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

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

Attached documents:

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Comment ID: PSLPP16/1295  Respondent: 15216321 / Douglas Ollington  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the 2016 Draft Local Plan by Guildford Borough Council (GBC) for the following reasons:

1. Destroying the Green Belt

I object to the proposal to remove (“in-set”) Ripley, Send and Clandon from the Green Belt.

No one in this country voted for destroying the Green Belt. We already live in one of the most overcrowded parts of the country. Roads are congested, schools and hospitals are full to capacity. Just to drive out of our village in the morning can take up to 15 minutes to cover a few hundred meters. This is stressful and will only get far worse with more houses.

We are filled with despair at losing what our families have worked all our life so hard for. They have worked hard to ensure their family live in “England’s green and pleasant land”, away from the suburban sprawl. All this is in jeopardy with this plan.

By building more and more houses, this will not only further congest an already congested road network, but the overcrowding will create further pressure on schools, hospitals, and other services, all of which will require more people to be employed, which will probably result in a further round of house building and so on. What is GBC doing to consider the wellbeing of their constituents? Was not happiness and wellbeing also on our Prime Minister’s agenda?

High volumes of traffic and congestion have negative effects. These include road collisions, the severance of communities, the costs of delays and the unreliability of journey times to people and businesses. Environmental impacts include traffic noise, air pollution and amenity issues. At a global scale, vehicle emissions contribute to climate change. Some parts of the major roads in Surrey operate significantly beyond their capacity, resulting in traffic congestion, and forcing drivers down rural / country lanes to avoid main roads, leading to further congestion and road accidents.

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

Attached documents:

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Comment ID: PSLPP16/1297  Respondent: 15216321 / Douglas Ollington  Agent:

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

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

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

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1. Unbalanced allocation of development in one area of the Borough

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

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

Attached documents:

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Comment ID: SQLP16/299  Respondent: 15216321 / Douglas Ollington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
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**Answer (if comment is on questions 1-7 of the questionnaire): ()**

### 1. I object to the limited consultation period

GBC have released this proposal in at the last minute without any consultation whatsoever with the community, and have only allotted six weeks to register objections to a document over 1,800 pages, this is half the usual time.

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

**Attached documents:**
<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/467</th>
<th>Respondent: 15219585 / Ray Harris</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

1. I object to the very high numbers of new houses to be built in the Horsleys and nearby areas. Such numbers will damage the character of the area and will place burdens on the local infrastructure that cannot cope. The roads are not wide enough to tolerate substantial increases in resident numbers and the rail system is almost at capacity now during peak hours and so cannot accommodate any major increases in demand.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/646</th>
<th>Respondent: 15219585 / Ray Harris</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

1. I object very strongly to the inclusion of the Former Wisley Airfield (FWA/TFM) in the local plan. Extensive public consultation has shown the madness of the idea to build over 2000 houses on the FWA. It is absolutely shocking that GBC is still including the Former Wisley Airfield in the local plan. GBC has no concern for democracy.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/1304</th>
<th>Respondent: 15219585 / Ray Harris</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

Page 95 of 2804
I object to the Guildford Borough Council proposed Local Plan June 2016 for the following reasons.

1. I object to the plan because it proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas for housing increases.

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

Attached documents:

Comment ID: PSLPA16/468  Respondent: 15220001 / E Haworth  Agent:

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

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

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

I am writing to express my objection to the development plans laid out in the Guildford Local Plan 2016.

Ripley

My son is at school in Ripley village, I attend and volunteer at the playgroup there and have a lot of friends in the village. It is a special village with a distinctive historical character. The suggestion to remove land on Rose Lane from the greenbelt is so extraordinary that I didn't believe this could be true at first.

This is greenbelt at its finest. The villages of West Horsley and Ripley are separated by this land and the unique, semi-rural character of each community is wholly dependent on it. Pretty much every morning I see at least one species of bird of prey over Rose Lane, very frequently three different species in one day. Red kites nest in this specific greenbelt land, buzzards and kestrels (less and less common across the UK now) can be seen most days as I drive down Rose Lane.

I have also recently spent a glorious evening in a residential garden in Ripley observing a family of Little Owls. There are also tawny, barn and short eared owls on the Papercourt Meadows along Newark Lane. Be assured that these species cannot survive in isolated pockets of green space. Every bite you take out of the green belt has a direct impact on the whole surrounding area.

It is also worth pointing out the hideous traffic congestion in Ripley village at rush hour. I contend with this on a daily basis and it is both dangerous and stressful for everyone involved and must make the lives of Newark Lane residents a misery at times.

It is astonishing to me that the council sees no duty of care for such a historically significant, thriving village. Instead of supporting the village and it's wonderful wildlife by working to remedy the dreadful traffic congestion you are instead working to worsen this problem and to destroy the very things that make the village special.

Please, leave the greenbelt alone. These developments will cause untold damage to the whole area.

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

Attached documents:
15. We object to the proposed Infrastructure Schedule (Appendix C)

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

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

Attached documents:

16. We object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is we believe inaccurate; it inflates the needs of the borough by distorted student numbers.

This figure is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

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

We both trust that the objections made above are fully taken into consideration and that the Plan shall be amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
13. We object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

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

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. **Why was a brownfield site removed and replaced by a Greenfield site?**

**There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site.** This only came to light for local residents following a Council meeting on 11th May 2016.

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

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

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

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

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

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
Comment ID: PSLPS16/649  Respondent: 15220097 / Douglas Barr Trudy Amos  Agent:

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

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

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

14. We object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

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

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

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

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

Attached documents:

Comment ID: PSLPP16/1312  Respondent: 15220097 / Douglas Barr Trudy Amos  Agent:

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

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

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

8. We object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

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

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

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

Attached documents:

Comment ID: PSLPP16/1309  Respondent: 15220097 / Douglas Barr Trudy Amos  Agent:

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

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

1. We object to the sustainable employment policy (Policy E1)

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

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

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

Attached documents:

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<th>Comment ID: PSLPP16/1310</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2</td>
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2. We object to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

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

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

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

Attached documents:

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

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

7. We object to the loss of rural employment (Policy E5)

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

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

Attached documents:

Comment ID: PSLPP16/1313  Respondent: 15220097 / Douglas Barr Trudy Amos  Agent:

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

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

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

9. We object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

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

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

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

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

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

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

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

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

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

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

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

Attached documents:

Comment ID: PSLPP16/1314  Respondent: 15220097 / Douglas Barr Trudy Amos  Agent:

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

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

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

11. We object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

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

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

Attached documents:

Comment ID: PSLPP16/1315  Respondent: 15220097 / Douglas Barr Trudy Amos  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

12. We object to poor air quality concerns (Policy I3)

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

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

Attached documents:

Comment ID: PSLPP16/1307  Respondent: 15220097 / Douglas Barr Trudy Amos  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

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

1. We object to not protecting the Green Belt (Policy P2)

We object to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. Once taken the green belt is lost forever.

There are no exceptional circumstances for these villages and the land to be taken from the Green Belt.

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

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

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

Attached documents:

Comment ID: PSLPP16/1308  Respondent: 15220097 / Douglas Barr Trudy Amos  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

1. **We object to development in areas which are at risk of flooding (Policy P4)**

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

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

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

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

Attached documents:

Comment ID: PSLPP16/1305  Respondent: 15220097 / Douglas Barr Trudy Amos  Agent:

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

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

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

We object wholeheartedly to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

We set out below our objections to specific policies and matters within the Plan.

1. **We object to the Local Plan as the development proposed will not be sustainable (Policy S1)**

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

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

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

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

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

Attached documents:

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Comment ID: PSLPP16/1306  
Respondent: 15220097 / Douglas Barr Trudy Amos  
Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

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

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

1. We object to the Borough Wide Strategy (Policy S2)

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

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages.

The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

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

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

Attached documents:

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Comment ID: pslp172/1717  
Respondent: 15220097 / Douglas Barr Trudy Amos  
Agent:
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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<tr>
<td>We object to the Policy A42 change at Clockbarn in Tannery Lane because:</td>
</tr>
<tr>
<td>• The increase to 60 homes in place of 45 homes is 33% more and too much</td>
</tr>
<tr>
<td>• It ignores all the hundreds of previous objections made by local people</td>
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<tr>
<td>• It will worsen access and traffic problems in Tannery Lane and at the A247 junction</td>
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<tr>
<td>• It will make erosion of the Green Belt in our village worse</td>
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<tr>
<td>• It will make surface water flooding, which is already bad, even worse</td>
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<td>• It will impact open countryside views from the River Wey Navigation</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Attached documents:</td>
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<td>Comment ID: pslp172/1719  Respondent: 15220097 / Douglas Barr Trudy Amos  Agent:</td>
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<th>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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<tr>
<td>Land at Garlick’s Arch, Send Marsh, Policy A43.</td>
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<tr>
<td>Now 400 homes and 6 Travelling Showpeople plots</td>
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<tr>
<td>We object to the Policy A43 change at Garlick’s Arch because:</td>
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<tr>
<td>• It ignores all the thousands of previous objections made by local people</td>
</tr>
<tr>
<td>• There is no proven demand for Travelling Showpeople plots in this location</td>
</tr>
<tr>
<td>• It is beautiful permanent Green Belt and no “exceptional circumstances” exist</td>
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<tr>
<td>• It will cause over-development of our village and the number of homes is excessive</td>
</tr>
<tr>
<td>• It is exquisite ancient woodland that existed at the time of Elizabeth I</td>
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<tr>
<td>• It will join up Ripley and Send and defeat the key purpose of Green Belt</td>
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<tr>
<td>• It is subject to frequent flooding and is currently a flood zone 2 allocation</td>
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<td>• It is contaminated by lead shot accumulated over fifty years</td>
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<td>• It will generate excessive traffic that will block up the local roads of Send and Ripley</td>
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<tr>
<td>Comment ID: pslp172/1720  Respondent: 15220097 / Douglas Barr Trudy Amos  Agent:</td>
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</table>
Land at Burnt Common, London Road, Policy A58.

Now a new allocation for a minimum of 7,000 sq m of industrial or warehousing

We object to Policy A 58 at Burnt Common because:

- It was deleted from the 2014 draft because of all the objections made previously
- The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land
- There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units
- The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt
- The impact on small surrounding roads will create traffic gridlock
- It will join up existing villages and defeat the purpose of the Green Belt

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

Attached documents:
My wife and I have lived in Ockham for over 40 years and find that the plan for Wisley Airfield completely out of order. The traffic congestion at the moment is at a ridiculous high level and the roads in the Ockham are at gridlock several times each day. The fact that the roads are not maintained properly and the sides of the roads are full of potholes and there are potholes even in the middle of the roads are not uncommon. Furthermore this would lead to a big intrusion into the green belt and the pollution would be beyond belief.

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

Attached documents:

GBC Draft Borough Plan re Normandy - Site Allocation 46 and Site 47

We are writing to object to the proposals to develop Normandy and Flexford as a strategic site, under the draft local plan. We object to this large scale proposal as long term residents of the area, for the following reasons:

The scale of the development is out of keeping with the character of the village and destroying greenbelt land

Normandy is a semi rural village, open with a linear arrangement along the A323, and along Glaziers Lane and Westward Lane, Flexford is an adjoined small residential area. The proposed development with the large number of houses and secondary school is totally out of keeping with the current size of the village, and will infill an open field, on greenbelt land, giving the village the feel of a large estate, dramatically changing the character and openness of the area.

Infrastructure and services

As a resident of Guildford Road we already witness the effect of traffic on the area, particularly during rush hour when the road is busy and already at capacity. Road works and traffic accidents on main routes mean that cars from the A31 and A3 use village roads, including Glaziers Lane and Westward Lane as a cut through. Adding over a thousand houses and a secondary school to the area, with already congested slow, narrow local roads and difficult junctions to the main roads, would result in traffic chaos. The proposals are unrealistic and unsustainable and will lead to gridlocked roads, road safety issues and the potential for a detrimental effect on the well being of residents due to increase in pollution. Traffic simulations have demonstrated that the roads are already operating above the designed capacity, with no viable solutions proposed to mitigate or address this issue.
The doctor’s surgery in Glaziers Lane is already struggling to cope with the needs of current patients, and influx of over 2000 people from the new development would put the service under unacceptable strain leading to even longer waiting times. This issue needs to be addressed not ignored in the planning process.

Drainage in the area is poor and has led to flooding issues in the past. The high water table exacerbates the problem, as will adding a large area of developed land in the middle of the village. Whilst some work has been done in the area to address flooding issues this would need to be considered in the context of the proposed development.

**The Proposed secondary school.**

The data for building a large secondary school in the area must be questioned, particularly as there are two secondary schools Ash Manor and Kings College which are both currently undersubscribed. Funding should be used to develop and support these two schools, both of which have struggled over the years to attract pupils. Surely the council should be working with these schools as a matter of priority to improve their facilities, capacity and results before moving onto building another school. I understand that other schools are increasing their capacity to take more pupils, so I would again question the need for another large secondary school.

The station in Wanborough has been put forward as a means of getting students to and from the proposed new secondary school for students living on the Blackwell Farm development. Whilst on paper this would seem a viable option, I consider that the cost of fares would prove prohibitive for many parents to use this method as would other forms of public transport, and should be examined further. Also should we be creating the need for pupils to commute to school rather than consider more local options?

**Detrimental effect on wildlife**

As a member of Surrey Wildlife Trust I am extremely concerned regarding the irreversible loss of greenbelt land and valuable habitat such as ancient woodland, hedgerows and Grassland for indigenous species. The continued fragmentation of natural habitats has already caused a dramatic decline in bird and wildlife populations and we should be looking to preserve not destroy these areas maintaining Normandy’s unique rural character.

We close by reiterating our objection to the density and scale of the development, doubling the size of the village, destroying the openness and character of the area, and above all building on greenbelt land that should be protected for future generations.

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

Attached documents:
1) I object to the proposal to build a link road on Clay Lane - particularly phase 2 with the massive roundabout designed for Jacobs Well which is totally out of keeping in the village and moreover it is sited on a very dangerous corner.

2) I object to the burial ground north of Salt Box Lane in Jacobs Well (policy no A23) being removed from the green belt which will no doubt lead to in-filling in the village with more housing being built.

3) I object to the number of houses being built being 693 houses per annum. How will our infrastructure cope with this? Also many of these sites are planned on the green belt.

I do hope local councillors will take some notice of the concerns of local people who will live with the implications of these decisions.

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

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<td>PSLPS16/653</td>
<td>15220321 / K P Buchanan</td>
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<td>I object to the proposed new interchange on the A3 at Burnt Common because it will lead to heavy congestion, noise and pollution from slow moving traffic through Send. This junction is inappropriate and ill considered. The roads in the area are already saturated with traffic and this junction will result in a huge increase in traffic, some of which will be using the junction will result in a huge increase in traffic, some of which will be using the junction as a shortcut from the A3/Burnt Common to Junction 11 on the M25.</td>
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<td>I object to the total erosion of the Green Belt in this area. The vast majority of the housing development proposed in this Draft Plan is on Green Belt. The housing need is inflated and the actual housing needs can be met on brown field sites within the Borough.</td>
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<td>This Draft Plan should be rejected. Development on the Green Belt sites is not justified. There are no 'special circumstances' which justify using Green Belt land as proposed by this Plan. Green Belt land acts as a necessary buffer between Woking and Guildford, it is a valuable and beautiful amenity enjoyed by thousands of residents and it is unjustified and thoroughly ill-considered to use this Green Belt to meet this Local Plan particularly as there are far more appropriate alternatives.</td>
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<td>Please ensure my comments are placed before the Planning Committee and the Councillors.</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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I object to the grossly disproportionate amount of industrial and residential development which the Draft Plan is proposing in the immediate area in which we live.

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

**Attached documents:**

| Comment ID: PSLPS16/654 | Respondent: 15225281 / Roger Gamlin | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

I object to the way new sites have been included with virtually no notice, consultation or consideration for the residents of Send, Ripley and Burnt Common. No sound evidence for the housing numbers stated in the Plan has been presented and there are more appropriate areas for industrial development.

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

**Attached documents:**

I object, Greenbelt is a precious resource and once destroyed can never be recovered.

In particular I object to Land at Garlick's Arch being developed. 400 houses are far too many, the area of Ripley and Send can not sustain such urbanisation. The roads are already too busy, this will totally destroy it. The junction at A3 is not needed.
Send should not be removed from Greenbelt.

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

Attached documents:

Comment ID: PSLPS16/6417  Respondent: 15225281 / Roger Gamlin  Agent:

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

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

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

I object to the large proposed development 2,000 houses at Gosden Hill (A25)

It will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Ripley & Send.

Gosden Hill is located entirely within the green belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet the requirements of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,

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

Attached documents:

Comment ID: PSLPS16/6419  Respondent: 15225281 / Roger Gamlin  Agent:

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

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

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

I object to the large proposed development 1,850 houses at Blackwell Farm (A26)

It will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Ripley & Send.

Blackwell Farm is located entirely within the green belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet the requirement of the NPPF. Furthermore, Blackwell Farm performs all five functions of green belt.

The Blackwell Farm development would result in harm to the Surrey Hills Area of Outstanding Natural Beauty (AONB), harm to an Area of Great Landscape Value (AGLV), and harm to the setting to the AONB. (Blackwell Farm forms the
views into and out of the Hogs Back ridge). The NPPF is clear that AONBs should be afforded the highest level of protection in relation to landscape and scenic beauty. All development proposals within and adjacent to the AONB must conserve or enhance its special qualities.

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

Attached documents:

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Comment ID: PSLPS16/658  Respondent: 15225281 / Roger Gamlin  Agent:

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

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

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

I Object

This development has not had full consultation under Regulation 18.

This development is far too large for local area to sustain, the local roads and services will not cope.

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

Attached documents:

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Comment ID: PSLPS16/6420  Respondent: 15225281 / Roger Gamlin  Agent:

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

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

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

1. I object to the large proposed development of 2,000 houses at Wisley Airfield (A35)

It will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Ripley & Send.

The re-inclusion in the Plan of Policy A35 (land at Three Farms Meadow, alias the former Wisley airfield, Ockham) is fundamentally wrong. Following a huge public outcry, Guildford Planning Committee has unanimously rejected a recent planning application for precisely this development on 14 separate grounds.
Policy A35 should be removed from the plan for all the reasons the development was rejected by the Planning Committee, including:

- Green Belt location and absence of “exceptional circumstances”.
- Misrepresentation of the site as brownfield land less than 15%.
- Proximity to RHS Wisley and Thames Basin Heath Special Protection Area (TBHSPA).
- Proximity to A3/M25 bottleneck and Ripley village.
- Loss of high-quality agricultural land (55% of the site), in breach of national.
- Disproportion of locating of over 2,000 dwellings within the ancient village of Ockham with just 159.
- Lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway stations which have no spare parking.
- Damage to neighbouring communities of creating a settlement of 5,000 residents, equivalent to East and West Horsley.
- Failure to evaluate the cumulative impact of this and nearby development sites on the

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

Attached documents:

Comment ID: PSLPS16/659  Respondent: 15225281 / Roger Gamlin  Agent:

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

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

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

I Object

This is an area of outstanding beauty and will be ruined by this unsympathetic development. It is not in keeping with local housing.

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

Attached documents:

Comment ID: PSLPS16/660  Respondent: 15225281 / Roger Gamlin  Agent:

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

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

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

This requires full consultation under Regulation 18.

This development will place an undue burden on local traffic flow and destroy the village of Send. The local roads are simply too small to cope with such development.

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

Attached documents:

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

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

I also object to 45 houses at Clockbarn Nursery, again the local roads are single file and are not able to carry an increase in traffic.

I would urge you to do all in your power to stop this act of ecological vandalism by Guildford Council, once the countryside will have gone it will be gone forever.

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

Attached documents:

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

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

I Object

This is Greenbelt land, the area can not be destroyed by development.

There is not sufficient infrastructure in place to support such a development. The roads will be snarled up with traffic.

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

Attached documents:
I also object to 400 houses and 7000Metres of Industrial space at Garlick's arch, there is plenty of Industrial space at Slyfield. It is totally inappropriate at Garlick's Arch because apart from flooding, it is ancient woodland.

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

Attached documents:

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

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

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

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. The site is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. The development of the site will increase the risk of flooding. There are other sites that do not flood that can be developed and therefore this site should not be removed from the Plan (Policy P4).
This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

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

Given the site’s proximity to the A3 it will suffer from considerable noise pollution, which would be detrimental to all residents. The level of traffic along the A3 and with the road often being congested will result in a poor air quality for the site.

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

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

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

Attached documents:

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**Comment ID:** PSLPS16/656  **Respondent:** 15225281 / Roger Gamlin  **Agent:**

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

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

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

I Object

GBC has not followed correct procedure, this requires full consultation under Regulation 18.

Traffic flow will be too heavy for local roads to bear, this is Greenbelt land and should remain so.

This junction is not needed.

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

Attached documents:

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**Comment ID:** PSLPS16/6384  **Respondent:** 15225281 / Roger Gamlin  **Agent:**

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

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

I would like most to Object to a new interchange with the A3 at Burnt Common, this is totally unnecessary as there is a North flow junction at Wisley and it will cause destruction of local forestry.

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

Attached documents:

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Comment ID: PSLPS16/6422  Respondent: 15225281 / Roger Gamlin  Agent:

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

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

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

1. I object to the inclusion of Land for new north facing slip roads to/from A3 at Send Marsh/Burnt Common (A43a)

This is only being included in the Plan as a result of the inclusion of the Garlick’s Arch site (A43). The creation of this junction will create more traffic through Ripley, Clandon and Send.

Should the junction be deemed necessary I am concerned that the land being allocated for the junction will result in a sub-standard junction being created using the existing slip road accesses, rather than investing in a full upgrade to the junction, which may require the compulsory purchase of surrounding land.

The Plan anticipates the delivery of these new slip roads between 2021 and 2027, way after the anticipated delivery of the Site 43. These improvements to the A3 are controlled by Highways England and not Guildford Borough Council. Highways England has indicated that they do not have plans to consider improvements to the A3 before 2020. In reality the new slip roads will not happen at best until the back end of the proposed time frame.

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

Attached documents:

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Comment ID: PSLPS16/657  Respondent: 15225281 / Roger Gamlin  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
I Object
This development is too much for the village to sustain.

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

Attached documents:

Comment ID: PSLPS16/6385  Respondent: 15225281 / Roger Gamlin  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

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

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

I also Object to the development of 40 houses and 2 travellers pitches at Send Hill, again the roads are single lane and too narrow for any traffic increase.

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

Attached documents:

Comment ID: PSLPP16/13352  Respondent: 15225281 / Roger Gamlin  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

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

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

The scale of the proposed development is mind blowing, we really do not have the infrastructure in place to support so many houses, specifically, schools, nurseries, doctors surgeries, etc.

Many of the local roads are single track roads which will be totally unable to support increased traffic flows.

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

Attached documents:

Comment ID: PSLPP16/13351  Respondent: 15225281 / Roger Gamlin  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
I am writing to you personally to ask you to stop the villages around Guildford from being removed from the Green Belt.

We are currently faced with an attack by concrete invaders which will take some of our local villages out of the Green Belt forever, once they have been lost there is no going back.

In particular I am referring to Send and Ripley, both traditional English villages, surrounded by beautiful and in some cases ancient woodland. I am writing to you personally to ask you to stop the villages around Guildford from being removed from the Green Belt.

We are currently faced with an attack by concrete invaders which will take some of our local villages out of the Green Belt forever, once they have been lost there is no going back.

In particular I am referring to Send and Ripley, both traditional English villages, surrounded by beautiful and in some cases ancient woodland.

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

Attached documents:

Comment ID: PSLPP16/1321  Respondent: 15225281 / Roger Gamlin  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

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

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

I Object

This plan has not received full consultation under Regulation 18.

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

Attached documents:

Comment ID: pslp172/1226  Respondent: 15225281 / Roger Gamlin  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy A42 Tannery Lane

I object to Policy A42 because the increase is far too much for such a narrow lane which will never sustain the increase in traffic load particularly at the junction with A247.

It will make the erosion of the Green Belt worse and detrimentally affect the landscape from River Wey.

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

Attached documents:

Comment ID: pslp172/1227  Respondent: 15225281 / Roger Gamlin  Agent:

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

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

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

Policy A43 Garlick’s Arch

I object to Policy A43 because it is permanent Green Belt and must be preserved for future generations.

There is no proven demand for Travelling Showpeople Plots.

It will cause overdevelopment in the village which is already bursting at seams, There are no exceptional circumstances which warrant demolishing ancient woodland which has been a beauty spot since Queen Elizabeth 1.

This will generate excessive traffic compounding a traffic flow problem

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

Attached documents:

Comment ID: pslp172/1228  Respondent: 15225281 / Roger Gamlin  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy A58 Burnt Common.

I object to Policy A58 because there is no need or demand for extra industrial space when there are empty units at Slyfield.

The impact on the small surrounding roads will bring traffic chaos to the area.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/274</th>
<th>Respondent: 15225281 / Roger Gamlin</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
<td></td>
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</tbody>
</table>

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

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

Green Belt Policy 2 para 4.3.15

I object to the proposal to inset Send Business Park from the Green Belt because it is an area of outstanding beauty and should be preserved not built upon.

Vehicular access to Tannery Lane is already severely restricted and this is a wholly inappropriate site.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/477</th>
<th>Respondent: 15225857 / BlackOnyx Developments limited</th>
<th>Agent: AECOM (Philip Scott)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley South</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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

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

**PROPOSED SUBMISSION LOCAL PLAN (REGULATION 19) – JUNE 2016**

WEST HORSLEY (SOUTH): PROPOSED INSETTING FROM GREEN BELT AND PROPOSED SUBMISSION HOUSING ALLOCATION SITE A37 - LAND ADJACENT TO AND REAR OF BELL AND COLVILL, EPSOM ROAD, WEST HORSLEY
On behalf of our client, BlackOnyx Developments Limited, please accept and register these formal representations to the Borough Council’s Proposed Submission Local Plan (Regulation 19) in relation to the Proposed Submission insetting of West Horsley (South) from the Green Belt and Proposed Submission Policy A37 Land at and to the rear of Bell and Colvill, Epsom Road, West Horsley.

These representations confirm our support for the following Proposed Submission policies:

- Proposed Submission Policy S2: Borough Wide Strategy
- Proposed Submission Policy P2: Green Belt
- Proposed Insetting of West Horsley (South)
- Proposed Submission Site A37: Housing allocation: Land at and to the rear of Bell and Colvill, Epsom Road, West Horsley

Background

BlackOnyx Developments Limited fully supports the Borough Council’s Submission Local Plan in relation to the proposed insetting of West Horsley (South) from the Green Belt and the proposed allocation of 1.4 hectares of land at and to the rear of the Bell and Colvill, West Horsley as set out in Proposed Submission Policy P2 and Proposed Submission Site Allocation A37.

BlackOnyx Developments Limited has entered into an agreement with the freehold owner of No. 28 The Street, West Horsley to acquire the land in relation to the northern part of Proposed Submission Site A37, we are able to confirm that the northern part of site A37 is available and deliverable during the early part of the Plan period for housing development.

Proposed insetting of West Horsley (South)

West Horsley is a sustainable settlement which has grown significantly to the north of the A246 (Epsom Road) and includes a wide array of housing types together with a mix of local services and amenities including a car sales garage and service repair workshop, a shop, church, two pubs, Cranmore School, a village hall, and a community hall. Despite this, the entirety of the village is currently washed over by the Green Belt in the adopted Local Plan 2003. This approach is inconsistent with the Government’s latest advice contained in the National Planning Policy Framework (‘NPPF’).

In this important regard, the Government makes it clear that Green Belt villages should not to be seen as areas where no development should come forward, but rather where development opportunities, which do not intrude into the purposes underlyng the Green Belt designation, can be provided, they should be grasped. This is clear from NPPF paragraph 79 where the importance of the Green Belt is recognised, through the reiteration of the purposes of Green Belt in paragraph 80 and the approach to boundaries in paragraph 85. Paragraph 86 deals with washed over villages directly and the policy advises that washing over is not the proper approach for those areas where the settlements do not make a Green Belt contribution.

Throughout the preparation of the new Local Plan, the Borough Council has consistently (and publicly) acknowledged that the current policy approach to Green Belt and villages does not accord with the NPPF. For example, paragraph 4.111 in the Draft Local Plan (2014) states:

“All our villages, except Ash Green, and our major previously developed sites are currently washed over by the Green Belt designation. National planning policy states that only those villages whose open character make an important contribution to the openness of the Green Belt should be included in the Green Belt. Those that do not should instead be inset from the Green Belt, removing their Green Belt status. It also states that we should not include land in the Green Belt which is unnecessary to keep permanently open. It is important to stress that whilst the Green Belt policy would no longer apply, other development control policies will still serve to restrict any inappropriate development in these places, including for instance Conservation Area status.” (Paragraph 4.111 Draft Guildford Borough Local Plan: Strategy and Sites - July 2014).
Promoting Sustainable Patterns of Development

The adopted 2003 policy approach to washing over villages with Green Belt has had a significant restrictive impact on the ability to deliver new homes and jobs across the borough. It has clearly played its part in the failure of the borough to meet housing need which has resulted in a step change increase in recent years as evidence by the Objectively Assessed Need (OAN).

In that respect, we note from the Proposed Submission Local Plan the Borough Council’s proposed spatial development strategy and the commitment to delivering up to 13,860 new homes during the new Plan period as part of promoting sustainable patterns of development (to meet acute housing need in the borough). This new approach is set out in Proposed Submission Policy S2: Borough Wide Strategy. We strongly support the aims and objective of Policy S2.

In particular, we note that Proposed Submission Policy S2 has been informed and developed through a series of evidence based assessments including five volumes of the Green Belt and Countryside Study (‘GBCS’) and various iterations of borough-wide housing need assessment. We note that the Council’s Proposed Submission Policy S2 seeks to distribute housing growth fairly across the borough with a focus towards supporting and creating sustainable settlements. We consider that the Borough Wide Strategy is credible and robust and is in accordance with the aims and objectives of the NPPF.

Additionally, we also note the depth of information and evidence contained in the Borough Council’s GBCS (2014) which provides an objective independent assessment of the characteristics of settlements and villages including West Horsley (South). The GBCS confirms that areas of West Horsley (South) to the north of the Epsom Road including the Proposed Submission Site A37 are part of the village and as such lend themselves to inclusion within the inset settlement boundary rather than the open countryside. In accordance with the policy principles of the NPPF we agree that West Horsley (South) does not contribute to the open characteristics of the Green Belt and should therefore be inset from the Green Belt.

Green Belt and Countryside Study Volume IV Stage 3: West Horsley (South) – Proposed insetting from Green Belt

Proposed Submission Housing Site A37

Proposed Submission Housing Site A37 comprises either previously developed (brownfield) land, or comprises land located within the heart of the village and largely surrounded by ‘medium density development’ as confirmed in the Borough Council’s GBCS (2014). The GBCS also concludes that proposed Submission Housing Site A37 has defensible boundaries, and land to the rear of Bell and Colvill has no visual connection to the open countryside. Furthermore, the entirety of the proposed Submission Housing Site A37 has no particular landscape, ecological, or heritage value.

The Proposed Submission housing site benefits from access to a local bus route and the nearest train station (East Horsley) is only 1.9 miles away and can easily be reached by cycle or car. We note that the LAA and GBCS both conclude that the proposed submission site is sustainable and accessible and its development would not be detrimental to sustainability objectives.

Extent of Proposed Submission Policy A37: Land at and to the rear of Bell & Colvill, Epsom Road, West Horsley as illustrated in the LAA and Proposed Submission Local Plan

A range of baseline studies have been undertaken to assess the likely impacts of delivering housing development in this location. The studies include; a transport assessment, planning assessment, flood risk assessment, ecological (stage 1) assessment, acoustic report, and landscape and visual impact assessment. All the studies carried out demonstrate that housing development can be delivered on the proposed submission site without causing any harm to amenities or the local environment.
Indeed the provision of new housing on Proposed Submission Site A37 will benefit local services and amenities by ensuring that the village caters for housing needs, retains a mix of people (including young people), and helps to ensure the continued health of services and facilities in West Horsley.

[IMAGE 3]
West Horsley (South) – Proposed Submission Local Plan - Inset Plan showing extent of village that should be inset from the Green Belt

**Housing Need**

The need to ensure that development opportunities are seized in Guildford borough is particularly important given that past housing delivery has not met identified housing needs and consequently the Council cannot currently demonstrate a 5 year supply of deliverable housing land.

In this respect, it is highly notable that the annual housing Monitoring Report 2014/2015 published in October 2015 acknowledges that the Council has only 2.4 years of housing land supply against a requirement to identify 5 years housing land supply. Furthermore, housing need in the borough has risen from 322 dwellings per year to an Objectively Assessed Need (OAN) of 693 homes per year as identified in the West Surrey SHMA (2015) because housing land. The OAN includes a significant uplift for affordability, economic factors and student growth. The Council needs to facilitate a step change in housing land supply and delivery to meet local need.

The Council’s sustainable development strategy (Proposed Submission Policy S2: Borough Wide Strategy) identifies that the Council’s preferred approach is to focus future housing growth in the most sustainable locations which the Council identify as:

- Guildford town centre
- Urban areas
- Inset villages
- Identified Green Belt villages

This strategy is clearly in conformity with the aims and objectives contained in the NPPF. In that respect, sustainable, accessible settlements such as West Horsley (South) can play an important role in the borough’s development strategy and make a meaningful contribution towards accommodating new housing development to meet acute housing need. The Council’s recognition of this in the Proposed Submission Local Plan is therefore supported.

**Conclusion**

Proposed Submission Policy P2 Green Belt acknowledges that the current adopted 2003 Local Plan policy approach of washing over villages and settlements with Green Belt is not in accordance with the Government’s advice contained in the NPPF (2012). The NPPF is abundantly clear that only villages and settlements whose open characteristics contribute to the purposes of the Green Belt should to be subject to Green Belt designation.

The NPPF also advises that villages have an important contribution to make in terms of accommodating new housing development to help meet housing need as part of sustainable spatial patterns of development. It is completely appropriate that West Horsley (South) takes its fair share of housing growth during the new Plan period. In this regard, the provision of housing on Proposed Submission Site A37 will benefit local services and amenities by ensuring that the village caters for local housing need, retains a healthy mix of people (including young people), and will help to ensure the continued health of village services and facilities.
The current planning policy approach and the washing over of settlements within Green Belt has contributed to a lack of available housing land within Guildford borough. The borough can only currently demonstrate a 2.4 year supply of housing land against a requirement to identify 5 years of deliverable housing land supply.

We note that the GBCS 2014 has objectively assessed the characteristics of West Horsley (South) and its boundaries in relation to the Green Belt. The GBCS has concluded that West Horsley (South) should be inset along new defensible boundaries to incorporate Proposed Submission Site A37.

Furthermore, Proposed Submission Site A37 has already been subject to a range of baseline technical assessments which demonstrate that the proposed submission housing site is of no particular landscape, ecological, or heritage importance. In addition, safe vehicular access to the Proposed Submission Site can be delivered and the land ownership is not a constraint to development.

In light of all of the above, it is clear the case that the proposed insetting of West Horsley (South) within the Green Belt, together with the allocation of Site A37, are appropriate policy objectives and are fully in conformity with the Government’s advice contained in the NPPF. The Proposed Submission Local Plan should be supported accordingly.

I would be very grateful if you would confirm that these representations in support of Proposed Submission Policies; S2: Borough Wide Strategy, P2: Green Belt, the insetting of West Horsley (South), and the Proposed Submission Housing Site A37: Land at and to the rear of Bell and Colvill, Epsom Road, West Horsley have been registered and are ‘duly made’.

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

Attached documents:
- Picture 2 Aecom.png (145 KB)
- Picture 3 Aecom.png (271 KB)
- Picture 1 Aecom.png (273 KB)

Comment ID: PSLPS16/666  Respondent: 15225857 / BlackOnyx Developments limited  Agent: AECOM (Philip Scott)

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

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

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

LAND SOUTH OF NEW POND ROAD, FURZE HILL LANE, FARNCOMBE, GODALMING GU7 3NP

On behalf of my client Blackonyx Developments Ltd please accept and register formal representations to the Borough Council’s Proposed Submission Local Plan (Regulation 19) in relation to the Proposed Submission Borough wide Strategy and additionally the omission of land south of New Pond Road, Furze Hill Land, Farncombe from the list of sites proposed for future housing development.

These representations confirm our objection to the following Proposed Submission policies:

- Omission site: Land south of New Pond Road, Furze Hill Lane, Farncombe

Background

The omission site forms the eastern part of a larger 16 hectare linear area of land which is dissected by Furze Hill Lane immediately abutting the north-eastern edge of Farncombe. Farncombe itself is a sustainable, accessible settlement which
flows seamlessly into Godalming town, both settlements lie in the borough of Waverley. Farncombe and Godalming incorporate a wide range of services, amenities, schools, employment opportunities, local retail stores, and a mainline railway station (serving London). The railway station is just 0.7 mile from the omission site.

[IMAGE 1]

The Omission site (highlighted in red) which is contiguous to permitted residential development at Farncombe

The omission site comprises undeveloped fields with a scattering of individual mature trees. The whole site lies within the existing extent of the designated Green Belt. Two established vehicular access points serve the omission site together with laid tracks, one access point is formed via the eastern side of Furze Hill Lane which runs along the entirety of the western boundary of the omission site whilst a further access point exists directly via New Pond Road (B3000) which runs along, and defines, the northern boundary of the omission site. The eastern site boundary is formed by vegetation running alongside the mainline railway line. Contiguous with the southern boundary of the omission site is land which lies within the administrative area of Waverley Borough Council and which now benefits from planning permission for residential development (50 dwellings).

In short therefore, the omission site lies entirely within (bounded by) defined man-made physical features along all boundaries, and is contiguous with a substantial committed residential development.

Additionally, the visual appearance of the omission site is significantly impacted due to the nature of a variety of structures including caravans, motor homes and vehicles which have been in-situ on the site for a number of years.

[IMAGE 2]

Existing access track and established residential community residing on the omission site

The omission site has, until now, been promoted for housing development. The housing potential of the omission site was identified in the Borough Council’s Strategic Housing Land Availability Assessment (June 2014) and was assessed as part of the Green Belt and Countryside Study (2014), these evidence base studies led to the site subsequently being included as a draft housing allocation in the Borough Council’s draft new Local Plan: Strategy and Sites (July 2014) as site No 80. However, the omission site does not appear in the Proposed Submission Local Plan (June 2016).

Green Belt

The majority of the borough is washed over by the Green Belt. Paragraph 79 of the Government’s National Planning Policy Framework (NPPF) recognises the importance of Green Belt in preventing urban sprawl and keeping land open. The policy emphasises that an essential characteristic of Green Belts are their openness. Paragraph 80 of the NPPF sets out the five core purposes served by Green Belt:

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

However, notably, in paragraph 84 of the Green Belt policy section, whilst acknowledging the importance of Green Belt the Government also directs local planning authorities to promote sustainable patterns of development by channelling new development towards towns and villages, and in paragraph 85 of the NPPF the Government makes it abundantly clear that when defining Green Belt boundaries, LPAs should:

- not include land which it is unnecessary to keep permanently open.
The Borough Council has publicly recognised that the extent of the Green Belt is seriously impeding its ability to deliver housing and meet its housing land supply requirement. In that regard, the Borough Council commissioned an independent and objective assessment of the Green Belt and Countryside as part of the emerging new Local Plan Evidence Base. The five volumes of technical evidence forming the ‘Green Belt and Countryside Study (2014)’ assessed the quality and contribution that the omission site makes to the openness of the Green Belt and to the characteristics of the AONB and the Study concludes that the site (identified in the Study as area ‘F6-B’) “provides opportunities to accommodate development without significantly compromising the purposes and openness of the Green Belt”.

Housing Land Supply Position

The introduction of the Government’s National Planning Policy Framework (NPPF) directs local planning authorities to deliver a step change in the supply of housing by meeting ‘objectively assessed’ housing needs (NPPF, paragraph 47).

Given that Borough Council’s adopted Local Plan housing provision policy is out of date and there are no ‘saved’ policies in place that address development needs beyond 2006, GBC is out of step with the NPPF in relation to housing delivery. Additionally, the borough has a significant housing land supply shortfall when measured against a five year housing land supply.

We are aware that the West Surrey Strategic Housing Market Assessment (‘SHMA’) suggests the borough’s population is expected to grow by 15% (21,179) over the Plan period. Taking into account these figures together with the adjusted household formation rates, the SHMA (2015) concludes that the objectively assessed overall housing need (OAN) for Guildford borough is 693 dwellings per annum (dpa) over the Plan period.

Additionally, we note that the Borough Council openly acknowledges the acute housing shortfall within the Annual Monitoring Review (‘AMR’) 2013/14 (page 8). Notably, the AMR states that, “we are not currently able to demonstrate a five year supply of deliverable housing land without amendments to the Green Belt boundaries and use of countryside land”. Whilst the number of new homes constructed across the borough has increased, the number of deliverable houses completed last year was 242 dwellings. However, this is still substantially below the identified target need per annum (as set out in the SHMA 2015) and there continues to be a growing housing deficit in the borough.

As at June 2015 the Borough Council’s annual Monitoring Report confirms that Guildford’s total five-year requirement is 5,165 homes. To date, the Borough Council can demonstrate 2.4 years supply (2.5 years supply if pending applications in Ash and Tongham are included) against the identified need of 693 dwellings per annum. In this context, more housing land is required during the Plan period to meet acute need in the borough. The omission site can play an important part in helping to meet the acute shortfall of housing in the borough.

Land Availability Assessment (LAA) January 2015

The omission site is identified in the LAA (January 2015) as site No. 2241 Land at New Pond Road, Shalford. The LAA has discounted the omission site from the range of housing sites that were draft allocated in the July 2014 Local Plan. In this respect the LAA states that the omission site is not in accordance with the Sustainability Appraisal (June 2016) because the omission site is in medium sensitive Green Belt in the AONB. However, it is highly notable that there has been no site-specific assessment of the omission site’s credentials and the Sustainability Assessment only provides generalised performance criteria. In this respect:

- The omission site is now contiguous to a sustainable settlement (given the recent planning permission for 50 dwellings directly adjacent to the omission site),
- Comments received to application PA Ref. WA/2014/1330 adjacent the omission site from the Surrey Hills AONB representative state that this area does not significantly contribute to the AONB,
- The Council is promoting major greenfield land in the Green Belt for housing which score twice as many red sustainability performance markers as the omission site.

We consider that the Council’s decision to discount the omission site lacks credibility.

Related Matters

In addition to the Local Plan Evidence Base reports, the Borough Council will be mindful that since the publication of the draft Local Plan (July 2014), Waverley Borough Council has granted planning permission for 50 dwellings (PA Ref WA/
2014/1330) on land immediately south of the omission site. The decision of Waverley Borough Council effectively means that the omission site lies contiguous with land which will form part of the built-up part of Farncombe and within a clearly identifiable (and defensible) boundary of New Pond Road (B3000).

Under these circumstances, and in light of the established uses on the omission site, it is clearly not appropriate to draw the Green Belt boundary along the southern boundary of the omission site and it is unnecessary to keep it permanently open given there is a very significant defensible boundaries created by New Pond Road (B3000) and the railway line.

I trust that in advancing the new Local Plan the Borough Council will reconsider its decision to discount the omission site, and instead promote the omission site for housing development as it has done previously in accordance with the SHLAA (2014), the Green Belt and Countryside Study (2014), and the draft new Local Plan: Strategy and Sites (July 2014), and in light of Waverley Borough Council’s resolution to approve PA Ref. WA/2014/1330 which effectively means that land south of New Pond Road is contiguous with the built-up part of Farncombe and has clear and defensible man-made boundaries.

I would be very grateful if you would confirm that these representations **objecting** to the Proposed Submission Local Plan have been registered and are ‘duly made’.

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

**Attached documents:**

- [image 2 aecom.jpg](image 2 aecom.jpg) (165 KB)
- [image 1 aecom.jpg](image 1 aecom.jpg) (537 KB)

**Comment ID:** PSLPS16/661  **Respondent:** 15225857 / BlackOnyx Developments limited  **Agent:** AECOM (Philip Scott)

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A27

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

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

**PROPOSED SUBMISSION HOUSING ALLOCATION SITE A27 – WARREN FARM, WHITE LANE, ASH GREEN**

On behalf of our client, BlackOnyx Guildford Limited, please accept and register these formal representations to the Borough Council’s Proposed Submission Local Plan (Regulation 19) in relation to the Proposed Submission Borough wide Strategy and additionally Proposed Submission Housing Site A27: Warren Farm, White Lane, Ash Green.

These representations confirm our **support** for the following Proposed Submission policies:

- Proposed Submission **Policy S2: Borough Wide Strategy**
- Proposed Submission **Site A27:** Warren Farm, White Lane, Ash Green

**Background**
BlackOnyx Guildford Limited fully supports the Borough Council’s Submission Local Plan in relation to the proposed allocation of 3.36 hectares of land at Warren Farm, White Lane, Ash Green as set out in Proposed Submission Site Allocation A27. BlackOnyx Guildford Limited has entered into an agreement with the freehold owners of Warren Farm and Surrey House in relation to the proposed submission site and we are able to confirm that site A27 is available and deliverable during the early part of the new Plan period for housing development.

Ash Green is a sustainable settlement to the south east of Ash with excellent access to the strategic highway network including the A31 (south) and A331 (west). The village currently benefits from a bus service to nearby Ash where there are a wide range of local services and amenities. The village itself lies outside of the Green Belt and outside the Area of Outstanding Natural Beauty (‘AONB’) and Area of Great Landscape Value. Furthermore, the proposed submission site and village are not identified as being within a Conservation Area and there are no listed buildings in the immediate vicinity of the proposed submission housing site.

The absence of Green Belt and AONB means that Ash Green is an appropriate spatial location to accommodate modest housing growth as part of the Council’s proposed spatial development strategy which will seek to deliver up to 13,860 new homes across the borough during the plan period in order to meet acute housing need.

In this respect, we note that Proposed Submission Policy S2: Borough Wide Strategy has been informed and developed through a series of evidence based assessments including five volumes of the Green Belt and Countryside Study (‘GBCS’) and various iterations of borough-wide housing need assessment. We note that the Council’s Proposed Submission Policy S2 seeks to distribute housing growth fairly across the borough with a focus towards supporting and creating sustainable settlements. We consider that the Borough Wide Strategy is credible and robust and is in accordance with the aims and objectives of the NPPF.

[IMAGE 1]

Extent of Ash Green as shown on the Proposed Submission Inset Map with Proposed Submission Site A27 Warren Farm shown highlighted in red

Proposed Submission Housing Site A27

The enclosed character of Proposed Submission Housing Site A27 is a result of existing residential development on two sides and mature woodland on the other boundaries means the site can be developed to form a natural extension of the built form of Ash Green. The site is distinctly separate from the open countryside to the south and redevelopment would not impact significantly on the wider countryside and would be consistent with the existing settlement pattern of Ash Green.

Furthermore, proposed submission housing site A27 has no particular landscape, ecological, or heritage value save for the semi natural ancient woodland which borders (but lies outside) the southern boundary of the site. In respect to the woodland, Natural England has confirmed that, provided new housing development incorporates a 15 metre non-development buffer housing development will not cause any detriment to the woodland area.

The principle of residential development on the site has also been considered by an independent Planning Inspector who concluded, ‘There is no dispute between the parties that, in principle, the development of this site would be acceptable’ (ref: APP/Y3615/A/14/2220129 paragraph 30). All that remains to be resolved are matters of detailed design.

It is also highly notable that the Strategic Housing Land Availability Assessment and draft Local Plan (July 2014) have consistently identified and promoted the proposed submission housing site throughout the emerging new Local Plan process.

[IMAGE 2]

The extent of Proposed Submission Policy A27: Warren Farm, White Lane, Ash Green as shown in the SHLAA

Deliverable Access
One of the key issues to the delivery of Proposed Submission Site A27 is ensuring that safe vehicular access can be created onto White Lane. In this important respect, we are able to confirm that access arrangements to the Proposed Submission site can be safely delivered via Surrey House and that such an access solution will provide appropriate sight lines and forward vision ensuring highway safety for road users. The approach to the site access reflects the access solution proposed for planning application 16/P/00120 which has been reviewed and assessed by the Surrey County Highway Authority. The Highway Authority has confirmed in writing that it has ‘no objection’ to highway access being formed via Surrey House to serve 58 dwellings.

**Other Related Matters**

A range of baseline studies have been undertaken to assess the likely impacts of delivering housing development on Proposed Submission housing site A27. Those studies include; transport assessment, planning assessment, flood risk and surface water run-off assessment, land contamination study, and ecological (stage 1 and stage 2) assessments. All the studies carried out, to date, demonstrate that housing development can be delivered on the proposed submission site without causing any significant harm to amenities or the local environment.

Indeed the provision of new housing on Proposed Submission Site A27 will benefit local services and amenities by ensuring that the village caters for housing needs including affordable housing for local people, and retains a healthy mix of people (including young people and families).

**Housing Need**

Housing delivery in the borough has not kept pace with identified housing need or targets, and consequently the Council cannot currently demonstrate a 5 year supply of housing land. In this respect, it is highly notable that the annual housing Monitoring Report 2014/2015 published in October 2015 acknowledges that the borough has identified just 2.4 years of housing land supply when measured against the required 5 year housing land supply target. The Council needs a real step change in housing land supply and delivery in order to meet local housing need. The lack of sufficient new housing also restricts the ability of the borough’s economy to grow and prosper.

The Council’s sustainable development strategy (Proposed Submission Policy S2: Borough Wide Strategy) identifies that the Council’s preferred approach is to focus future housing growth in the most sustainable locations which the Council identify as:

- Guildford town centre
- Urban areas
- Inset villages
- Identified Green Belt villages

We support the Council’s strategy of focussing housing growth on sustainable settlements and villages. The Council’s development strategy set out in Proposed Submission Policy S2 is clearly in conformity with the aims and objectives contained in the NPPF. In that respect, sustainable, accessible settlements such as Ash Green which are outside of the Green Belt, and not designated as part of the AONB or Area of Great Landscape Value can play an important role as part of the borough’s development strategy and make a meaningful contribution towards accommodating new housing development to meet acute housing need.

The Council’s promotion of Ash Green as a sustainable location for modest housing growth and the promotion of Housing Site A27 in the Proposed Submission Local Plan is appropriate and we strongly support these elements of the emerging Local Plan.

**Conclusion**

The NPPF advises that villages and sustainable settlements have an important contribution to make in terms of accommodating housing grow in order to help meet acute housing need and to support local economies.
The Council’s emerging new Local Plan and the associated evidence base has consistently identified Site A27 land at Warren Farm, White Lane as a suitable site to deliver new housing. An independent Planning Inspector has also concluded that there is no objection to the principle of housing development on the site, subject to detailed design considerations.

Safe vehicular access is available from White Lane and this has been confirmed in writing by the County Highway Authority in relation to planning application 16/P/00120. There are no objections from statutory parties including Natural England which has confirmed that, provided a 15 metre buffer is safeguarded between proposed housing and the woodland to the south of the Proposed Submission site, it will have no objection to housing development.

We are aware that the annual housing Monitoring Report 2014/2015 published in October 2015 acknowledges that the Council has identified just 2.4 years of housing land supply when measured against the required 5 year housing land supply target. Proposed Submission Site A27 will make an important contribution towards helping to address this significant shortfall and meeting the acute housing need locally. It will also deliver an element of affordable housing for those most in need.

In light of all of the above, it is clear that the Proposed Submission Housing Site A27 Warren Farm, White Lane, Ash Green is an appropriate housing site allocation. The promotion of site A27 is fully in conformity with the aims and objectives of the NPPF and it will help support the Council’s proposed spatial development strategy set out in Proposed Submission Policy S2.

I would be very grateful if you would confirm that these representations in support of Proposed Submission Policy S2: Borough Wide Strategy, and our support for the Proposed Submission Housing Site A27: Warren Farm, White Lane, Ash Green have been registered and are ‘duly made’.

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

Attached documents:
- IMAGE 1 AECOM.png (500 KB)
- IMAGE 2 AECOM.png (346 KB)

Comment ID: PSLPP16/1322  Respondent: 15225857 / BlackOnyx Developments limited  Agent: AECOM (Philip Scott)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

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

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

PROPOSED SUITABLE ALTERNATIVE NATURAL GREENSPACE (‘SANG’) - LAND ADJACENT TO LONG REACH, WEST HORSLLEY

On behalf of our client, Green Reach Limited the owner of the land subject of these representations, please accept and register these formal representations to the Borough Council’s Proposed Submission Local Plan (Regulation 19) in regard to the promotion of 24.73 hectares of land adjacent Long Reach, West Horsley to deliver Suitable Alternative Natural Greenspace (‘SANG’).

In this particular regard these representations confirm our support for the following Proposed Submission policies:

- Proposed Submission Policy P5: Thames Basin Heaths Special Protection Areas
- Proposed Submission Policy I1: Infrastructure and Delivery
Additionally, these representations confirm our support the following identified site in Section 3 (Green Infrastructure) contained in the Borough Council’s Infrastructure Schedule:

- SANG 8 Long Reach Farm, West Horsley

However, we wish to propose a minor modification to the proposed site description of SANG 8 as follows:

‘SANG 8 Land Adjacent Long Reach, West Horsley’.

Reasoned Justification: The proposed SANG 8 as described in the Infrastructure Schedule is incorrect as there is no such address as Long Reach Farm. The 24.73 hectare site comprises former agricultural land located to immediately to the west (adjacent to) Long Reach in West Horsley. The land owner is Green Reach Limited. Therefore, an appropriate site description for inclusion within the Infrastructure Schedule is ‘SANG 8 Land Adjacent Long Reach, West Horsley’.

Background

Green Reach Limited fully supports the Submission Local Plan in regard to the provision of a new strategic SANG to the east of the borough at Long Reach, West Horsley. This is an area of the borough that suffers from a significant shortfall of strategic SANG. That shortfall detrimentally impacts on the Borough Council’s ability to encourage people away from the protected Thames Basin Heaths SPA and it has a significant detrimental impact on the Council’s spatial development strategy.

The provision of SANG forms an important part of a mitigation strategy formulated by the Borough Council as part of the adopted Thames Basin Heaths Special Protection Area (‘SPA’) Avoidance Strategy (2009-2016) which is overseen and implemented in partnership with Natural England in its role as an advisor to Government and as a statutory consultee.

The SPA is an area of Lowland Heath covering over 8,000 hectares of land across Surrey, Berkshire and Hampshire. The SPA was designated under the European Birds Directive in March 2005 because it supports important breeding populations of ground nesting birds that are particularly vulnerable to disturbance activities associated with people and domestic pets. To protect ground nesting birds the SPAs are afforded significant protection from new residential development so that the ecological integrity of SPAs are maintained. Accordingly, there is a significant requirement for areas affected by SPA to provide sufficient SANG in the SPA ‘zone of influence’ (400 metres to 5km catchment measured from the boundary of the SPA) to provide accessible areas for walking and outdoor recreation so that existing and future residents have a suitable alternative to using the highly vulnerable SPA for their recreation needs.

The urgent requirement for SANG has understandably resulted in the Borough Council identifying the need for new SANG land as part of the Infrastructure Schedule which accompanies the Proposed Submission Local Plan.

The Proposed Submission Local Plan identifies the need for, and objectives of, additional SANG land as part of Proposed Submission Policy P5: Thames Basin Heaths Special Protection Areas and Proposed Submission Policy I1: Infrastructure and Delivery. We fully support the aims and objectives of these proposed submission policies which are fully consistent with the Government’s National Planning Policy Framework (NPPF) and with Policy NRM6 of the South East Plan (which remains applicable at the regional level).

Specifically, in regard to national planning policy; section 11 of the NPPF is dedicated to the need to conserve and enhance the natural environment and in particular the need to minimise impacts on biodiversity and providing net gains in biodiversity wherever possible. Section 11 encourages local planning authorities to, ‘...set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure’. In this regard, we consider that Proposed Submission Policy SP5 and Policy I1, and proposed SANG 8 are fully in accordance with the NPPF.

Suitable Alternative Natural Greenspace – SANG 8 Long Reach, West Horsley

SANG’s themselves need to be rural in character and appearance, they should be interesting in their own right, comprise a minimum of 8 hectares in size incorporating at minimum 2.3 kilometre walk, and maintained and managed in perpetuity,
and to deliver works that will improve SANG’s overall quality. This enhances the SANG’s capacity for recreation, makes it more attractive to users, and increases residents choice of sites to visit, thereby providing a range of sites of comparable interest and quality and removing visitor pressure on the fragile habitat of the SPA. At 24.73 hectares in size with potential for a car park and, the proposed Long Reach SANG will be able to accommodate an appropriate circular walk and would have a mitigation catchment area of 5 kilometres meaning that it would represent a strategic SANG in a geographic part of the borough that is short of available SANG land.

The site itself comprises 24.73 hectares of former agricultural land. The proposed site is not within a conservation area and there are no listed buildings or structures on the site. Furthermore, the site is not within the designated Area of Outstanding Natural Beauty (‘AONB’) and is not identified as being important in terms of any ecological designation. The site is located within the Green Belt, however, the primary function of SANG land is for informal recreation purposes drawing people away from the SPA and therefore the function and use of SANG will maintain the open characteristics of Green Belt in accordance with national planning policy.

A raft of baseline studies have been undertaken to assess the likely impacts of delivering a strategic SANG in this location, including; transport assessment, planning assessment, flooding and flood risk, ecological (stage 1) assessment, and landscape and visual impact assessment. All of these assessments demonstrate that the proposed SANG 8 can be delivered without causing detriment and indeed the benefits to the landscape, ecological value of the site and to the conservation objectives arising from the need to protect the Thames Basin Heaths SPA are considerable.

[IMAGE 1]

**Proposed SANG 8 Land Adjacent Long Reach, West Horsley**

A further benefit of proposed SANG 8 is that such provision would enable the potential impacts of permitted housing within the appropriate catchment to be properly mitigated and delivered in areas of the borough that would not otherwise be able to accommodate new housing. To be clear, SANG does not make unacceptable housing proposals acceptable. Its primary function is to act as mitigation against the potential harmful impacts of residents who might otherwise travel to the SPA for their outdoor recreation needs. Additionally, once designated and laid-out SANG land is maintained and improved in perpetuity meaning that it cannot be developed for alternative uses. Longer term maintenance and management of SANG will also ensure that SANG land deliver enhanced habitats for flora and fauna leading to ecological enrichment of landscapes.

The owners of proposed SANG 8 have already engaged with a variety of local and national stakeholders to discuss matters of broad principle including compliance with the Thames Basin Heaths SPA Avoidance Strategy. In particular, the owners have engaged with Natural England as part of its Discretionary Advice Service and has secured (without prejudice) advice on the principles of delivering a strategic SANG in this location. Natural England has confirmed that, subject to detailed considerations, it has no objection in principle to SANG 8 at Long Reach, West Horsley which is proposed in the Infrastructure Schedule.

**Conclusion**

The proposed Long Reach SANG (‘SANG 8’) as identified in the Borough Council’s Infrastructure Schedule and as supported by Proposed Submission Policy SP5 and Policy I1 is fully in accordance with the objectives of the Government’s National Planning Policy Framework, it will support the aims and objectives of policy NMR6 in the South East Plan, and it will support and uphold the Borough Council’s commitment towards the preservation and mitigation of the Thames Basin Heaths SPA as set out in the Council’s adopted Avoidance Strategy (2009-2016).

In all these respects the delivery of a strategic SANG site in this part of the borough, where there is a significant shortfall of appropriate SANG, is fully in accordance with the strategic policy objectives of the Borough Council.

We trust therefore that the Borough Council will continue to support the proposed SANG 8 as part of its Infrastructure Schedule with the minor modification to the proposed description of the SANG as set out in these representations.

In light of all of the above, I would be very grateful if you would confirm that these representations in support of Proposed Submission Policy P5: Thames Basin Heaths Special Protection Areas and Proposed Submission Policy I1: Infrastructure...
and Delivery, and **support** (with minor modification) for the proposed SANG 8: Long Reach, West Horsley are ‘duly made’.

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

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/480</th>
<th>Respondent: 15226241 / S Bishop</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Horsley</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
</tbody>
</table>

I am writing just to endorse what other people have said.

So many houses will ruin our village, as it is the medical centre [text unreadable], the schools are at breaking point and we have very little [text unreadable] as it is.

As for taking some of the Green Belt would be terrible [text unreadable] as it was put there to protect villages such as ours. [text unreadable]

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

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: pslp171/91</th>
<th>Respondent: 15226465 / Rupert Trevelyan</th>
<th>Agent: Rapleys (Henry Asson)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
</tbody>
</table>

The policy echoes the guidance of the NPPF in saying that the Green Belt will be protected, and that while development on Green Belt land will be considered inappropriate in general, infilling within villages is acceptable. The policy identifies Gomshall as one of the villages within which limited infilling is permitted, and the draft plan proposes to increase Gomshall’s identified boundary in order to include the site, both of these things are supported.

The document’s glossary entry for infilling has been amended from “the filling of an underdeveloped plot in an otherwise built up frontage by not more than two dwellings.” It now reads: “Development of a small gap in an otherwise continuous built-up frontage, or the small-scale redevelopment of existing properties within such a frontage. It also includes infilling of small gaps within built development.” This definition broadens the terms of what is considered infill, and appears to
recognise that a greater level of tolerance is required in order to ensure that the plan can meet the borough’s housing requirement.

The widening of the identified boundaries of villages, along with the broadening of the plan’s definition of infill, is supported. My client’s land is located within the village envelope, and is a gap within the built development, and thus meets the definition of infill as set out in the local plan. In the interests of certainty, the local authority’s confirmation of this would be much appreciated.

Please do not hesitate to get in touch if you have any questions relating to the above. In the meantime I would be grateful if you could confirm receipt of this representation.

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

Attached documents:

Comment ID: pslp171/90  Respondent: 15226465 / Rupert Trevelyan  Agent: Rapleys (Henry Asson)
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

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

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

The policy has reduced the amount of housing for which the plan provides from 13,860 units to “at least” 12,426 (equivalent to 654 dwellings per year). However, it is noted that this coincides with:

• An addition of a year to the plan period;
• An increase in the previous estimates of population growth, equating to an additional 229 people per year;
• An Annual Housing Target in the policy document which provides for only 9,810 units over the plan period;
• The SHMA (2014) indicated that the housing need could be up to 816 units per year. The March 2017 addendum has a lower figure. No real evidence is provided to justify this; and
• The publication of an addendum to the LAA in June 2017 which stated the housing requirement for the period 2017-2022 to be 4,681. This is using the OAN of 654, and includes a deficit of 631 with a buffer of 20%. It is an effective requirement of 936 dwellings per annum.

Taken as a whole, these points indicate that housing need is likely to be higher than 12,426, possibly considerably so. As such, we support the presentation of the figure as a minimum target. However, given the apparent tension with the identified supply, the Local Authority should be taking a positive approach to residential development, and supporting the principle of development within settlement boundaries, including villages in the Green Belt such as Gomshall.

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

Attached documents:

Comment ID: PSLPS16/675  Respondent: 15226625 / M Mackender Lewis  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

Alterations to Local Plan Site A44

I refer to latest addition to the local plan for Send's future development. This site would obviously be built on Green Belt Land which is totally unsuitable for this area.

I object for the following reasons-

1. I object to - Send Hill is a very narrow lane and where this site will be there is absolutely there is no room for vehicles to pass each other, therefore the road would have to be widened, at a considerable cost, to enable lorries and caravans to go back and forth on this site.

The sewage in Send Hill has always been a problem with excess effluence, there is considerable back up so our properties has to be cleaned out on a regular basis, this will only be exacerbated by any additional properties.

2. I object to - The private owner part of this development which is opposite our property has become a haven for wild life with deer and there young, badgers, rabbits, bees, owls, and various species of birds.

3. I object to - When this piece of land was sold to the present owner there was a Covenant that a comer of this plot should not be disturbed as it was used as a dog and pet cemetery. Building on this plot surely is breaking the lease.

4. The GBC area of this development has been used for many years for recreation, children and dog walkers.

5. I object to - Previously the land was used and a waste infill. This infill was extremely toxic and has been vented over a period of time. If building was to take place, surely this would disturb any existing toxicity present which could result in serious problems!

6. The Cemetery enlargement in Send Hill has now been offered to all denominations which will increase both traffic and parking problems adding yet more chaos from your proposed development. If you take in consideration the traffic from schools and their latest rebuilds, this will increase the traffic problems. By the riding stables on Send Hill the road gets even narrower and very dangerous leading into Potters Lane.

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

Attached documents:

Comment ID: PSLPP16/1344  Respondent: 15226625 / M Mackender Lewis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
The Cemetery enlargement in Send Hill has now been offered to all denominations which will increase both traffic and parking problems adding yet more chaos from your proposed development. If you take in consideration the traffic from schools and their latest rebuilds, this will increase the traffic problems. By the riding stables on Send Hill the road gets even narrower and very dangerous leading into Potters Lane.

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

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

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

Attached documents:

Comment ID: PSLPS16/674   Respondent: 15227329 / Sharon Pask   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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

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

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

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

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

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

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

Attached documents:

Comment ID: PSLPS16/2318   Respondent: 15227329 / Sharon Pask   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

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

Attached documents:

Comment ID: PSLPS16/2324  Respondent: 15227329 / Sharon Pask  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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

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

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

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

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

Attached documents:

Comment ID: PSLPP16/1337  Respondent: 15227329 / Sharon Pask  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

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

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

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

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Related comments and responses:

**Comment ID:** PSLPP16/5097  **Respondent:** 15227329 / Sharon Pask  **Agent:**

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

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

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

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

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

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

Attached documents:

**Comment ID:** PSLPP16/5100  **Respondent:** 15227329 / Sharon Pask  **Agent:**

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

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

**Answer (if comment is on questions 1-7 of the questionnaire):**
I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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

Attached documents:

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Comment ID: PSLPP16/5094  Respondent: 15227329 / Sharon Pask  Agent:

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

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

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

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

I strongly object to the draft Local Plan for a number of reasons, namely:

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

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

Attached documents:

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Comment ID: PSLPP16/1339  Respondent: 15227329 / Sharon Pask  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

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

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

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

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

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

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

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
The Submission Plan contains several significant errors and there appears to be a lack of transparency in terms of the evidence base, the methodology and the subsequent assumptions that have been made. This is particularly so in relation to the ‘amended quantities of the new requirements for homes’ – the housing need figures - which in my view are open to legal challenge. By way of example, Policy S2 states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is just one of several glaring examples of why the plan is unsound. The inclusion of a 10% buffer in the housing number over the plan period which is entirely unnecessary. I object to the fact that in terms of the housing number, the Council has not (as it is required to do) used any constraints such as Green Belt, infrastructure, air quality, AONB and TBHSPA.

The plan represents a steady erosion of the Green Belt and no attempt appears to have been made to address the strategic significance of the Green Belt and its fundamental aim of preventing the sprawl of London. Specifically, I object to the change in the Green Belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact. I also object to the removal of 3.1 hectares from the Green Belt without any justification, to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.

In short, the proposed Submission Local Plan is unreliable, unbalanced and therefore unsafe. The Council has failed to remove this site from the Local Plan despite receiving thousands of objections from residents and from statutory consultees. The Council must know that site cannot contribute to the five-year housing projection due to several constraints, perhaps most notably the provision of sewerage capacity.

For the reasons listed above, I consider the plan is unsound and clearly not fit for purpose.

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

Attached documents:

Comment ID: PSLPS16/673  Respondent: 15227361 / David Garrod  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A21

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

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

I support retaining this land for allotment use, and also I support Policy 14. It is an important green area in the Guildford area, and needs to be retained as such. The view at the top of the site is very impressive, with commanding views of the surrounding areas. In the early morning here, you will see foxes and their cubs. There is an abundance of wildlife. Particularly a sparrow hawk, green woodpeckers, pied wagtails, robins and wrens, the latter nesting close to my allotment plot. Near my plot are a number of bee hives which are extremely important for the pollination of crops in the vicinity.

I am a pensioner, and love my allotment as I have PTSD and need to escape from my constant past memories, by working there daily, listening to the birds and wildlife, and chatting with my fellow ‘plotters’ about growing vegetables and fruit. I live 10 minutes walking distance from the site. I normally work there from about 7am to lunchtime, depending on the
weather. This is my first year working this allotment and I have been overweight, and on Doctors advice have been dieting. This year I have lost 2 stone in weight, from digging and continual exercise at the site, and feel much better for it. It has thus become my life, and I would be lost without my allotment. It is a lovely place to go and spend my time. Every Tuesday I also help out for an hour working on the school allotment helping year 3 children, learn how to plant seeds, tend their crops, and answer their questions about where their food comes from. This in my mind is extremely important. I have 4 grandchildren and they like visiting and learning about growing their own fruit and vegetables. Fresh produce is good for their health, and they must learn and understand where it comes from and that it is not found in a supermarket. Today for instance, for my lunch, I had new potatoes, broad beans, cos lettuce, radishes, beetroot and cucumber, all grown by myself. My health is improving as a result.

Lastly it is utterly important to have the entrance gates to the site. I have seen in my life devastating injuries as a result of chain saw usage, and power machinery. The emergency services must have access to the site at all times, especially if I or anyone else was to suffer a heart attack or stroke for instance.

Please keep our allotments.

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

Attached documents:

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Comment ID: PSLPA16/484  Respondent: 15227393 / Madeleine Davis  Agent: 

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

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

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

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I have lived in Send Marsh for 50 years and over the years have seen our green spaces being concreted over and planning permitted for people to sell off gardens for development. Enough is enough. We love our villages and to permit the construction of so many houses would destroy completely our rural life. This is an expensive area and to state that there would be affordable housing is complete rubbish. There is no such thing as "affordable" housing in this area.

I OBJECT to the removal of 15 villages, including Ripley and Send, from the green belt. This will lead to wholesale, and often inappropriate developments.

I OBJECT to the fact that GBC have not followed the correct process for Send and Ripley developments. Any significant changes to the 2014 proposals, such as the proposal development of Garlicks Arch, should have required another full consultation, which did not happen. This invalidates the whole process.

I OBJECT to the fact that GBC have failed to provide sound evidence in terms of the Employment Land Needs Assessment which shows that industrial space at Burnt Common IS NO LONGER NEEDED.

I OBJECT to Policy A43.30 the proposed development of Garlicks Arch designated for 400 houses and an industrial estate. This is a new site not included in the Regulation 18 draft and has NOT been consulted on previously. It is not only permanently protected green belt but also a site of ancient woodland with some trees planted in the 16th century.

I OBJECT to policy A43.30 the development of new four way interchange onto the A3 which would mean that narrow Send Road (A247) would be the main route for traffic leaving the M25 and A3. It is already crowded and vulnerable to traffic jams. Further traffic from this development would result in permanent gridlock. It simply would not work.
I OBJECT to policy A44 which would see 40 homes and two travellers' pitches on land west of Winds Ridge and Send Hill. This was again a NEW site NOT included in 18 draft and therefore has NOT been consulted on previously. Once again this is Green Belt land partly containing unsafe landfill. Access is by a narrow lane which could never take the volume of traffic that would ensue from traveller's pitches.

I OBJECT to the fact that the Local Plan takes no account of schools, doctors surgeries and roads that are already operating at full capacity. Another 4000 houses in this area with a conservative estimate of a further 8000 cars would be catastrophic.

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

Attached documents:

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Comment ID: PSLPA16/490  Respondent: 15227585 / Kelly Bartlett  Agent:

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

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

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

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

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

Attached documents:

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Comment ID: PSLPS16/682  Respondent: 15227585 / Kelly Bartlett  Agent:

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

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

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

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

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

Attached documents:
Comment ID: PSLPS16/684  Respondent: 15227585 / Kelly Bartlett  Agent:

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

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

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

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

After 14 months of consideration (and various extensions and amendments), Wisley

Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 6th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

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

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

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

Attached documents:

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Comment ID: PSLPP16/1381  Respondent: 15227585 / Kelly Bartlett  Agent:

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

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

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

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

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

Attached documents:

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Comment ID: PSLPP16/1382  Respondent: 15227585 / Kelly Bartlett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

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

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

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

Attached documents:
Comment ID: PSLPP16/1368  Respondent: 15227585 / Kelly Bartlett  Agent:

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

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

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

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

I am employed in the Ockham area and wish to strongly object to the draft Local Plan for a number of reasons, namely:

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

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

Attached documents:

Comment ID: PSLPP16/1384  Respondent: 15227585 / Kelly Bartlett  Agent:

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

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

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

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

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

Attached documents:

Comment ID: PSLPP16/1380  Respondent: 15227585 / Kelly Bartlett  Agent:

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

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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

Attached documents:

Comment ID: PSLPA16/491  Respondent: 15227617 / James Pask  Agent:

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

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

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

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

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

Attached documents:

Comment ID: PSLPA16/541  Respondent: 15227617 / James Pask  Agent:

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

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

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

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

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

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

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

Attached documents:

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

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

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

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

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

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

Attached documents:

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Comment ID: PSLPS16/743  Respondent: 15227617 / James Pask  Agent:

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

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

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

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

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

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

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

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

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

Attached documents:

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Comment ID: PSLPP16/1504  Respondent: 15227617 / James Pask  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

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

Attached documents:

Comment ID: PSLPP16/1386  Respondent: 15227617 / James Pask  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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

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

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

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

Attached documents:

Comment ID: PSLPP16/1390  Respondent: 15227617 / James Pask  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

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

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

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

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

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

c. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
d. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).

e. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

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

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

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

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

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

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

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

Attached documents:

Comment ID: PSLPP16/1507  Respondent: 15227617 / James Pask  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

8) I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1378  Respondent: 15227617 / James Pask  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) -

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/1501  **Respondent:** 15227617 / James Pask  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) -

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/1391  **Respondent:** 15227617 / James Pask  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P5
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1506  Respondent: 15227617 / James Pask  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1383  Respondent: 15227617 / James Pask  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/1503  Respondent: 15227617 / James Pask  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp17q/417  Respondent: 15227617 / James Pask  Agent:


Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed Submission Local Plan. The document contains a significant number of inaccuracies and, as a result, cannot be relied upon.

By way of example, the housing need number (which in any event appears to be incorrect) lacks any evidence in support. Statements are made without any supporting documentation being available.

In addition, I object to Paragraph 22 of the Submission Local Plan which in my view clearly doesn’t reflect the impact of the buildings on the surrounding area.

The constraints on the site and its physical location mean that this site remains the least sustainable strategic site identified in both this version and in previous versions of the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/883  Respondent: 15227809 / David Hall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Local Plan Consultation 2016

Please take note of my formal objections listed below, to parts of your Plan and my wish for this letter of objection to be seen by the Government’s Planning Inspector.

New Village Boundaries

I strongly object to your proposal to remove, Send, Send Marsh/Burnt Common & Ripley from the Green Belt and expanding their boundaries which encroach on a large proportion of Green Belt Land, which is to be used for Housing & Industrial development, (Policy P2).

This proposal is in direct contravention to the Government’s stated Policy as part of their pre-election manifesto and their issued guide lines to Councils with respect to the preservation of Green Belt land

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1393  Respondent: 15227809 / David Hall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Garlick’s Arch (Policy A43)

I strongly object to the proposed development of this area and its inclusion at a very late stage in the Proposal which would appear to be questionable in-so-far as ‘Correct Process’ has not been followed

This area is unsullied Green Belt land partially covered in ancient woodland, that was not considered as a potential ‘Development Area’ in the 2014 consultation. In fact during 2014 a planning application to build 25 houses in this area was rejected on ‘Sound Planning Grounds’.

It is therefore, to my mind, inconceivable that suddenly it has become acceptable to build 400 houses together with 7,000 sq.metres designated for light industrial usage on this Green Belt Land.

In additional to all this, is the fact that there is no existing or potential infrastructure which would be required to support such a development.

Further, the Employment Land Needs Assessment 2015 shows an 80% reduction in employment space from the previous ELNA conducted by GBC in 2013, which indicates that there is absolutely no need for the proposed 7,000 Sq.m. development at Burnt Common
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1394  Respondent: 15227809 / David Hall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **New North & South Bound Slip Roads to the A3 from the Clandon Road. (Policy A43a)**

(a) I strongly object to this proposal.

The A247 Clandon Road, is a narrow winding road in parts. Large articulated lorries can only traverse certain parts of it by running up over the opposite kerb. There is no prospect of the road being widened with housing and listed building being adjacent to the road.

It is already running at maximum capacity for large parts of the day, being the main feed road to Woking, Portsmouth and London via Ripley, for a very large area south of the A3 and could not possibly handle any increase in traffic flow.

The same comments apply to Send Barns Lane that becomes Send Road at the traffic lights, which leads to Woking via Old Woking. The roads thru Old Woking are also twisty & narrow and are currently a source of severe congestion. The introduction of Slip Roads onto the A247 would encourage traffic from the M25 & London which would only impact this increasingly deleterious situation further to the detriment of every householder in the whole Clandon, Send, Send Marsh/ Burnt Common & Ripley areas.

(b) I note also that the proposed development of the Slip Roads is dependent on land being ‘Gifted’ by the developer. To the best of my knowledge and that of my lawyers, the land immediately behind my property and that of my neighbours, is ‘Common Land’. Quite how the developer has acquired the right or ownership of this land, to ‘Gift’ is a mystery which will be investigated further.

These are just three of the items which most directly affect me. There are many others within in my immediate area which are less direct, but will nonetheless have deleterious effects on my environment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4378  Respondent: 15227809 / David Hall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

New Village Boundaries

I strongly object to your proposal to remove, Send, Send Marsh/Burnt Common & Ripley from the Green Belt and
expanding their boundaries which encroach on a large proportion of Green Belt Land, which is to be used for Housing &
Industrial development, (Policy P2).

This proposal is in direct contravention to the Government's stated Policy as part of their pre election manifesto and their
issued guide lines to Councils with respect to the preservation of Green Belt land

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: pslp172/1249</th>
<th>Respondent: 15227809 / David Hall</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A42 Clockbarn Nursery, Tannery Lane.

Reasons for objection to the proposals of 2016 are well documented and remain valid. An increase of a further 15 houses in
addition to the original 45, representing a 33.3% increase is completely unjustified and can only exacerbate further, an
already deleterious situation in the immediate locale. In addition it will contribute to worsening the situation at the A247
corner with the London Road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: pslp172/1250</th>
<th>Respondent: 15227809 / David Hall</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy A43 Garlick’s Arch – Send Marsh, Burnt Common and Ripley

Again, the many thousands of objections to the proposed development in the 2016 Consultation have been completely ignored with respect to this Green Belt land.

Now 8 Pitches/Plots for ‘Travelling/Showpeople have been added to the original 400 houses, without any proven demand or requirement.

There has not been any visible consideration given to the infrastructure which would be required to support this type of expansion. This proposal is impractical.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/492  Respondent: 15227905 / Nigel Alexander  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3379  Respondent: 15227905 / Nigel Alexander  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The number of new houses it is suggested need to be built cannot be justified.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPA16/3378  Respondent: 15227905 / Nigel Alexander  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT ESPECIALLY TO 6 POLICIES: A36, A37, A38, A39, A40 & A41:
• Amount of new housing far exceeds local need.
• Housing density excessive when compared with existing development.
• Would transform the Horsleys into a sizable town, something for which no case is made.
• No local support.
• Collective impact of these 6 sites on a small part of the borough not considered. Should not be treated as isolated, separate sites.
• Total amount of new building out of scale with the planned development elsewhere the borough, especially less sensitive urban areas not protected by Green Belt.
• Sites unsustainable. Key infrastructure lacking. No adequate provision is made to increase it – e.g. poor wastewater capacity, lack of schools, absence of traffic management plan, flooding.
• No account taken of additional impact of Wisley Airfield site on Horsleys.
• Extension of settlement boundaries too permissive. Horsleys characterised by streets with development along only one side of the road. Policies allow too many adjacent green fields to be developed by squaring off boundaries and claiming they don’t contribute to Green Belt “openness”. 6
• Green Belt gap with neighbouring settlements hugely narrowed, especially if Wisley Airfield is built on.
• Will harm compliance with NPPF 81 – e.g. by making cycling (including Prudential cycle races) too dangerous, ruining the rural setting of Waterloo Farm campsite, destroying the ambience of Grange Park Opera’s new “Theatre in the Woods”.
• Policy A40 especially unviable because of high water table and poor drainage, leading to regular winter flooding.
• Safe access and egress at Site A40 unachievable, owing to flooding, high speed limits, poor sight lines, narrow access to existing properties, inadequate pavements for elderly and schoolchildren, increasing use by recreational cyclists etc.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/685  Respondent: 15227905 / Nigel Alexander  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green

The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
10. I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 4th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A3S, is removed from the Local Plan with immediate effect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/6562  **Respondent:** 15227905 / Nigel Alexander  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I OBJECT ALSO TO POLICY A35 (WISLEY AIRFIELD):
• Should not be in the plan for all the reasons the Planning Committee rejected the identical recent proposal by Wisley Investment Properties.
• Irregularity of including this policy in the plan 24 hours before this planning application was rejected (like extending the time allowed for the developers to present their application).
• Unacceptable Conservative Party links between the developers and the Council.
• No Green Belt “exceptional circumstances” presented.
• Not a brownfield site as stated – only 15% of it.
• Proposed SCC waste site ignored.
• Loss of farming land.
• Too near RHS Wisley and Thames Basin Heath SPA.
• SANG would harm on SPA.
• Will aggravate traffic jams at A3 roundabout and M25 Junction 10.
• Unacceptable increase in air pollution.
• No existing public transport and stations miles away.
• No proper traffic data.
• Housing density far too great.
• Over 2,000 houses will swamp and destroy Ockham conservation area, with impact on listed buildings.
• Access confined to inadequate narrow lanes.
• Water table and surface water flooding not considered for site itself or for downstream areas on River Mole.
• Major impact on neighbouring villages, especially Horsleys.
• No assessment made of collective impact on area of this and 6 Horsley sites.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/13751</th>
<th>Respondent: 15227905 / Nigel Alexander</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2</td>
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I OBJECT TO POLICY D1 (BETTER PLACES):
• Poor monitoring.
• No force given to vernacular or historic design guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Comment ID: PSLPP16/13753</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

**I OBJECT TO POLICY D2 (SUSTAINABLE DESIGN ETC):**

Targets unachievable if Green Belt covered with amount of housing as proposed, causing traffic chaos, infrastructure failure and unacceptable levels of pollution.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/13754</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

**I OBJECT TO POLICY D3 (HISTORIC ENVIRONMENT):**

- Supports over development: you can’t “enhance” history. Doesn’t ban private interests from trying to make aggressive profits from privatising, commercialising and Disneyfying public historic assets.
- Doesn’t ban development near historic assets.
- Ignores NPPF 126, 131, 132, 133.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Page 167 of 2804
I OBJECT TO POLICY D4 (DEVELOPMENT IN URBAN AREAS AND INSET VILLAGES)

• No commitment to expand social housing or accommodation for people who can’t afford so-called affordable homes.
• Not enough new homes in urban areas, despite demand and need for urban regeneration and protection of Green Belt.
• Objectives for inset villages cancelled out by plans for excessive housing growth there.
• Too much emphasis on traditional shops, when a lot of this sector is in terminal decline.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13741  Respondent: 15227905 / Nigel Alexander  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I OBJECT TO POLICY E1 (EMPLOYMENT):

• Poor evidence base.
• Too much encouragement to low added-value employment that’s needed elsewhere in the country.
• Fails to concentrate general business activity in urban areas or business parks that have the infrastructure.
• Fails to differentiate this from appropriate rural business.
• Too much encouragement of warehousing, for which Guildford is too congested.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13742  Respondent: 15227905 / Nigel Alexander  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT TO POLICY E3 (EMPLOYMENT CAPACITY AND FLOORSPACE):
• Puts unnecessary obstacles in the way of using brownfield land into useful residential housing, contrary to government policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13743  Respondent: 15227905 / Nigel Alexander  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY E4 (SURREY RESEARCH PARK):
• Subordinates public planning policy to the University of Surrey’s private, commercial enterprises (not its public academic purpose).
• No cost/benefit analysis of harm to Green Belt involved in extending research park.
• Waters down research purpose of park, turning into a general business park.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13744  Respondent: 15227905 / Nigel Alexander  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY E5 (RURAL ECONOMY):
• Incompatible with high housing numbers proposed for rural areas elsewhere in the plan.
• Insetting and settlement boundary extension endanger appropriate rural activities listed that depend on maintaining rural areas’ character.
• Town-centre uses for rural areas contradict government’s localism policy and need to consult and protect village environments.
• Established commitments to high-speed rural broadband and mobile coverage watered down despite 2014 consultation responses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/13745  **Respondent:** 15227905 / Nigel Alexander  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

1 OBJECT TO POLICY E6 (LEISURE AND VISITOR EXPERIENCE):

- Danger of overdevelopment: success doesn’t depend on building “attractions” which can harm heritage and rural settings. No case made for creating new ones.
- No policy of opposing reduction in rural hotel capacity
- No definition of what added value interventions by Council can make to normal visitor market mechanisms.
- No policy of supporting Guildford countryside as its prime leisure and visitor asset, whose value rises as London gets bigger and busier.
- No vision of what the ideal visitor experience of the borough actually is and how to support its various elements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/13746  **Respondent:** 15227905 / Nigel Alexander  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

1 OBJECT TO POLICY E7 (TOWN CENTRE):

- No statement in policy wording of value of Guildford’s rural setting and views.
- No consideration of Town Centre Master Plan, GVG proposals or station redevelopment plans.
- Proportion of new housing in town far too small. Development pushed into countryside, ruining the latter and harming urban regeneration.
- No brownfield register.
- Too much big retail, despite online shopping revolution and decline of traditional high streets internationally. Futile to try to turn Guildford into Woking or Kingston.
- No measures to support small, niche retailers in town, e.g. through business rates.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/13747</th>
<th>Respondent: 15227905 / Nigel Alexander</th>
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<td>I OBJECT TO POLICY E8 (DISTRICT CENTRES):</td>
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<td>• Too much scope to expand rural retail centres to justify major housing expansion across the countryside, despite lack of demand. Will spoil character of villages while harming Guildford’s role as a retail hub.</td>
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<tr>
<td>• No measures to support existing rural shops and services, e.g. through business rates.</td>
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<tr>
<td>I OBJECT TO POLICY E9 (LOCAL CENTRES):</td>
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<td>• No need for retail development “adjacent” to rural centres for same reason as Policy E8.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ( )</strong></td>
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</table>
I OBJECT TO POLICY H1 (HOMES FOR ALL):
• Policy doesn’t set any constraints on building.
• Housing mix based on pre-Brexit growth and demographic assumptions and unreliable SHMA that wasn’t put out to formal public consultation and wasn’t scrutinised by Councillors.
• Fails to compel University of Surrey to use its thousands of planning permissions and existing space, such as car parks, for student accommodation.
• Lets University off the hook of accommodating all its students, so as to free up houses for the most needy in town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13735  Respondent: 15227905 / Nigel Alexander  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY H2 (AFFORDABLE HOMES):
• Using the official definition of Affordable is a joke. Affordable homes round here are not affordable! Pushing for these homes just means pushing for more development.
• The viability clause lets developers off the hook of providing even these (non-) affordable homes. Too open to manipulation.
• Contradicts government policy to develop less advantaged regions of the UK. People don’t have to live and work in Guildford but should be encouraged to move to cheaper, less congested areas.
• This policy won’t affect market forces or house prices. Guildford is too small and too near London to influence these, however many homes it builds.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13736  Respondent: 15227905 / Nigel Alexander  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT TO POLICY H3 (RURAL EXCEPTION HOMES):
  • It loosens the criteria by allowing “market housing” and development that changes the housing mix. Developers would be able to override NPPF 2 “exceptional circumstances” and other restrictions to build large houses in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1393  Respondent: 15227905 / Nigel Alexander  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the detrimental impact on transport, local roads and road Ispecifically object to:

   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   2. The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
   6. The lack of suitable public The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13756  Respondent: 15227905 / Nigel Alexander  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT TO POLICY I1 (INFRASTRUCTURE & DELIVERY)
• Infrastructure considered here as an afterthought, rather than pre-condition of development. Should be a key issue for the rest of the plan.
• Excessive housebuilding in countryside not supported by any funding or provision for infrastructure.
• Heavy focus on building on greenfield sites inefficient and unnecessary: cheap for developers but much more expensive for the public who have to fund the infrastructure.
• Draft CIL scale discourages use of brownfield land first.
• No plan for organic increase in existing traffic congestion, let alone once thousands of houses are built across the countryside. Local roads hardly considered. Green Belt being eroded before road widening/improvement plans certain, encouraging over-development of greenfield sites.

There has been insufficient or no thought or planning for improved infrastructure to sustain normal living requirements. It is unreasonable to believe that unless there is a radical change to road and transport services, education facilities, medical services, drainage and water supply the planned increase in house density will not be sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13757  Respondent: 15227905 / Nigel Alexander  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY I2 (SUPPORTING DTP’S ROAD STRATEGY):
• Doesn’t allow for catastrophic increase in traffic resulting from spreading new housing estates across the borough.
• Out of sync with DTP’s strategy: houses to be built and Green Belt destroyed before plans for A3 etc implemented.
• Road plans too optimistic anyway, especially post-Brexit. Probably won’t happen.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13758  Respondent: 15227905 / Nigel Alexander  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT TO POLICY I3 (SUSTAINABLE TRANSPORT):
• Just a list of generic measures, not related to real life or the particularities of Guildford.
• Fails to treat sustainability as a constraint. Assumes excessive levels of development proposed in the plan can be supported by sustainable development.
• Unrealistic. Most people can’t or won’t walk or cycle – commuters in a hurry, the elderly, children, people who are unwell or unfit, people carrying heavy shopping or other goods. I.e. most residents!
• Town’s eye view of transport. Ignores scarcity of existing rural public transport and commercial unviability of increasing it. Ignores terrible state of Surrey’s roads, potholes, flooding etc. Ignores extra stress to be created by huge new housing estates in countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1. I object to the fact that air quality concerns have not been taken seriously- air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU permitted Additional traffic will exacerbate this situation, Impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the Irreversible impact of the habitat degradation.
2. I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT TO POLICY I4 (GREEN & BLUE INFRASTRUCTURE):
• No teeth. Policy cancelled out by huge developments across the countryside. No mention of opportunity costs of loss of Green Belt services and amenities (e.g. farming).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/1387  Respondent: 15227905 / Nigel Alexander  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) -

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13737  Respondent: 15227905 / Nigel Alexander  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY P2 (GREEN BELT):
• No declaration of support for protecting the Guildford Green Belt, contrary to NPPF and government statements.
• No evaluation of value of local Green Belt as a public and private asset: it’s just treated as potential building land with a few inconvenient restrictions.
• Impact of Green Belt development on local agriculture ignored.
• Impact on rural leisure and tourism ignored.
• Impact on flood control ignored.
• Impact on carbon sink and knock-on effects for air pollution and climate change ignored.
• Impact on biodiversity ignored.
• Impact on natural heritage ignored.
• Impact on water catchment ignored.
• Impact on room for public space amenities (parks, cemeteries, waste facilities etc) ignored.
• Impact on rural business (e.g. mineral mining, film making) ignored.
• Impact on natural landmarks and views ignored.
• Harm to public health and wellbeing (physical, psychological) ignored.
• Allows excessive levels of development in breach of views expressed in last consultation and Conservative Party manifesto commitments at the last local elections.
• Has allowed ruling Councillors to argue that there is an acceptable percentage of Green Belt that should be sacrificed to development, when no such rule exists in the NPPF.
• Ignores alternative approaches, such as fair burden-sharing under which settlements would undertake to accommodate new development in proportion to their size.
• Disproportionate amount of development (most of it, in fact) to be in Green Belt. Too few new homes in urban areas where most people (especially the young and less privileged) want to live. This will act against much needed urban regeneration.
• “Insetting” of most villages disproportionate and unjustified in terms of their contribution under the NPPF to the purposes of the Green Belt. Based on flawed Green Belt and Countryside Study. Idea that most Guildford villages do not contribute to “openness” is subjective.
• Major settlement extensions allow indiscriminate housebuilding, as irregularly shaped villages are squared off to enclose green fields.
• Overall harm to Guildford Green Belt unjustified by any objective development need post-Brexit.
• Ignores most of NPPF 17 stipulations.

In addition to these comments I attach a key document I have referred to which gives greater detail of all the points of objections all of which I support fully.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT TO POLICY P3 (COUNTRYSIDE BEYOND THE GREEN BELT):
• Gives Ash and Tongham more protection than rest of borough, including existing Green Belt. But they don’t contribute to preventing London sprawl.
• Special treatment of ward represented by current Council Leader and his predecessor. Politically biased.
• A minor extension of Green Belt in one place does not justify its major destruction elsewhere (the inset villages).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13739  Respondent: 15227905 / Nigel Alexander  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I OBJECT TO POLICY P4 (FLOOD RISK AND WATER PROTECTION):
• Limits development of urban, brownfield, hardstanding sites, pushing development unnecessarily into the countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1394  Respondent: 15227905 / Nigel Alexander  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

1. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13740  Respondent: 15227905 / Nigel Alexander  Agent:
I OBJECT TO POLICY P5 (THAMES BASIN HEATH S.P.A.):
• Compensation mechanism too feeble to provide protection.
• Cynical encouragement of SANG to justify nearby development in protected
  areas. Does not extend protection or amount of green space, and can damage
  them (e.g. dog and cat attacks on wildlife).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT TO POLICY S1 (SUSTAINABLE DEVELOPMENT):
• No definition given, no reference to its importance in the NPPF, no guidelines for
  applying it to planning.
• No statement of how economic, social and environmental impacts should be
  balanced.
• No mention of Green Belt, Guildford’s greatest legacy by far to Sustainable
  Development. No commitment to protecting it.
• No reference to most of the NPPF Core Planning Principles.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT TO POLICY S2 (SUSTAINABLE DEVELOPMENT):
• No definition given, no reference to its importance in the NPPF, no guidelines for
  applying it to planning.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
4) I object to the disproportionate allocation of housing in this particular part of the Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13733  Respondent: 15227905 / Nigel Alexander  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY S2 (BOROUGH-WIDE STRATEGY:

• Numbers based on growth and demographic data now invalidated by Brexit.
• No justification given for 13,860 housing figure. Figure based on a secret formula used by consultants and never seen by anyone on the Council or by the public. Council has failed to seek its disclosure.
• 13,860 figure confuses the OAN with a housing target. No definite housing target given, leaving too much scope for the Council to make one up. I can’t understand how we’re being consulted when we don’t know how many houses the Council want to build, taking all the contraints into account.
• Figures based on a Housing Market Area that ignores 2 neighbouring districts (Rushmoor and Mole Valley) and is much too small, since most people commute or travel far outside the Area to shop or study. This distorts the figures: no reason why Guildford needs to build nearly twice as many large housing estates as the rest of Surrey put together, or half of all sites over 100 units.
• High numbers involved would transform character of the borough from mainly rural/Green Belt to urban, creating a corridor of development out of London as per Woking or Croydon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/585  Respondent: 15227905 / Nigel Alexander  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object strongly to the latest draft of the GBC local plan which has not allayed any of my concerns I raised in my original letter of objection.

The GBC plan still proposes to inset East Horsley from the Greenbelt, land which was designated as protected land for future generations, a decision made rightfully then and those reasons remain today and will do so into the future.

The development of over 2000 homes on the old Wisley Airfield site will change the landscape and environment of the local areas and beyond for ever and one feels will just continue the spread of Greater London into the countryside. The current infrastructure of roads, railways, schools, doctors surgeries, public services and the list goes on will not be able to handle such a large increase in the local population nor in many cases will it be possible to increase and improve those infrastructure requirements to meet the expanded needs. In short the local area will become paralysed and the lives of current residents diminished dramatically. One only needs to look at the already full railway car parks, the congestion at road junctions, the difficulty in securing a local school place and an appointment at the doctors to realise this to be the case. The proposed development of the Wisley site on its own would be a significant change to the quality of life in this part of Surrey without all the additional development proposals such as the additional 100 homes proposed near Horsley station.

What surprises me is that the new draft plan has not taken into account the revised ONS forecast for the increase in population which is less than half of the increase in housing stock being proposed. This daft plan needs to back to the drawing board.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to Send being moved from the Green Belt. The Green Belt area is why I moved here and I object very strongly to Send being removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the increase in housing from 185 to 485 - these changes require another full consultation of regulation 18 not the short cut of regulation 19 which you are trying to away with.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the proposed industrial development of 7000 houses sq metres as it is not required in this area. There are many more industrial sites standing empty in the surrounding area and the proposal for the housing is new and has not been consulted upon. The new 4 way interchange on to the A3 at Burnt Common would cause major road blockages on our small roads which are already very busy and getting busier.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the land west of Winds Ridge being designated for a travellers site and 40 houses - this is an open site and it would be dangerous to have an opening on to the narrow Send Hill.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I am writing to object to the inappropriate proposals to develop a large number of houses on Wisley Airfield and in the villages of East and West Horsley.

Collectively, you have failed to take into account the widespread resentment of your proposals in the local communities. In particular,

1) the residents within these communities have chosen to live in rural/semi rural surroundings. If they had wanted urbanisation then they would be living in better serviced and valued areas like Guildford or Surbiton. Our area is a magnet to visiting tourists from London and the surrounding areas to enjoy its beauty, unique wildlife and beautiful vistas in harmony with their surroundings. The amount of cyclists using our area is ever increasing and that is just one example of why it is important to protect our environment. This has a social and economic value.

2) The roads in our area are VERY poor. The conduct of the authorities in maintaining them is also poor. They are largely narrow lanes but with the increased traffic it can only make the situation worse for health and safety reasons.

3) The impact on our local services will be highly detrimental. Already, the stress of getting into the local doctors surgery at a suitable time or even just finding a suitable place to park can be very stressful to a large number of older residents in particular. Parking in the village is already poor especially at the weekend where even a minor event such as a wedding can make it extremely difficult. How will schooling cope? You are already adding to a county wide crisis of building more new homes with ever decreasing neighbourhood facilities.

4) The roads around East Horsley from 7am onwards are VERY busy. It can take up to 20 minutes on occasions just to cross the Effingham crossroads on the A246. Any additional housing of the scale you are proposing could lead to gridlock and again safety and pollution concerns in a wider area leading to the increased need for additional policing. Has this been included in your planning?
5) Local transport is very poor meaning ever increasing car journeys on ever more dangerous roads. There is virtually no existing infrastructure to accommodate these developments or very low levels of local employment which leads to increased traffic and environmental damage. The junction currently close to the Ockham Bites café onto the A3 is HIGHLY DANGEROUS. The traffic flow here is very fast and dense making it extremely difficult to join the road.

6) Within East and West Horsley once again the scale of these developments and some like on the Thatchers hotel site are on pristine land that I believe has never been sprayed by agri chemicals. Surely something to cherish.

Finally, if you feel the need to do a Milton Keynes style attack on some of our finest landscapes then consider further down the A3 corridor towards Guildford where the current car boot sale is held. This may give easier access onto the A3 by being on a straight stretch away from junctions and the damage to the landscape and environment is arguably more "acceptable" as it is arguably less polluting and gives a speedy access to the shops and facilities of Guildford and Burpham.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
3) The Garlick's Arch (Policy A43) proposal to build 400 houses and 7,000 sq. metres of light/ general industrial/ storage distribution space on the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/697  Respondent: 15229313 / Caitlin Gordon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4) The creation of new north and southbound slip roads to and from the A3 to the A247 Clandon Road (Policy A43A) at Burnt Common.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/700  Respondent: 15229313 / Caitlin Gordon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

7) Policy A44. 1.9. ha land west of winds ridge and send hill designated for 4+ homes and 2 travellers pitches. This has not been consulted upon. The subsoil contains documented unsafe landfill waste and the site is inappropriate due to the narrow country road, with insufficient access to the site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1408  Respondent: 15229313 / Caitlin Gordon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
I am writing to express my objections to the Local Plan that threatens to destroy the identity of our villages, zone vast areas of Green Belt land for development and make all the roads in the area permanently congested.

I wish to register my OBJECTIONS to:

1) The number of homes (693p.a.) that the Plan intends to deliver.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPS16/1321  **Respondent:** 15231137 / Martin Rossetti  **Agent:**
Re: Proposals for development in Normandy's Green Belt between Glaziers Lane & Westwood Lane, Guildford Borough Council (GBC) Draft Local Plan Site A46

We, as residents of Normandy, are writing to express our concerns and objections to the above proposals that are included in the draft structure plan for our village - proposals that include 1100 new houses, secondary school for 1500 pupils, primary school for 420 pupils, retail shops, showmen's pitches and yards, 60 bed residential or care home etc etc.

We object to the above proposals for the reasons below -

This area is green belt land, land for our enjoyment, open space, countryside, land full of wildlife, deer, hedgehogs, birds, foxes, badgers etc etc. Natural habitats and wildlife need to be protected, our area is a priority habitat under The Wildlife and Countryside act 1981 and the NERC act. We object to the erosion of our green belt land; green belt policy is about preventing urban sprawl by keeping land permanently open, the National Planning Policy Framework (NPPF) writes about openness and permanency, openness and permanency in our Surrey Hills Area an area of outstanding natural beauty ... we have a Surrey Hills sign less than half a mile from our house. The above proposals would destroy our green belt.

The proposals are disproportionate and would be an unsuitable development, a 100% increase in the number of homes in our village, the joining of Flexford and Normandy infilled with housing destroying the rural environment and taking away the free space between our hamlets. This area referred to as Site A46 is arable grade 3 pasture land, erosion of this free space will have devastating effects on our wildlife - where will they have to live? The proposed development will increase the urbanisation and joining of Guildford, Normandy, Flexford and Ash/Tongham areas.

Surrey County Council (SCC), we understand, recommended a development at Blackwell Farm site A26 for a number of reasons but in particular for reasons of accessibility in transport terms. Why has this been ignored in favour of this proposal A46? The site A46 proposals would cause complete and unworkable traffic chaos - our roads are gridlocked during rush hour times as it is, Guildford Road/Aldershot Road and the Hogs Back A31. We have a narrow humpback bridge with weight restrictions in Glaziers Lane over the railway and a single track bridge with the railway going over the top in Westwood Lane. The junction at the beginning of Glaziers Lane at the crossroads with the Guildford Road/Aldershot Road has been turned down for improvement due to lack of space, ditto the Westwood Lane junction at the Wyke Church of St Marks. These are both narrow country lanes totally unable to cope with the necessary construction traffic let alone the traffic generated by 1100 additional homes and the 2 proposed schools! In many places there is insufficient room to widen either of our country lanes, Glaziers Lane/Westwood Lane, there are Grade 2 listed buildings, 'Little Glaziers' for example which is close to the edge of the lane and would be severely impacted by any road widening proposals.

GBC objected to development on MOD land in Aldershot on grounds of insufficient capacity of our roads network, how can they therefore propose development here on the same limited road network?

The railway bridge in Westwood Lane would not permit double decker buses to pass under it and we question if it would be safe for the volume of school children on foot to pass under it with the current level of traffic let alone the increased volume due to the expansion of our villages/hamlets after the completion of the proposed development.

Wanborough railway station would only be a marginal advantage, the 2 stations either side of it are Ash Station and Guildford Main Station, any
school children would be far better served to attend the current primary and secondary schools in the main Guildford area or Ash Manor Secondary School and its surrounding primary schools.

Both Ash Manor School and Kings College are undersubscribed on pupil numbers, Kings College currently undersubscribed by 57%, 511 free places,
Ash Manor currently undersubscribed by 110 places so there is no need for a further secondary school in this area. There is the new Guildford University Technical College due to open in 2018 which will take 240 pupils from the age of 14 in its first year and will double to 480 places. Christ's College is currently taking 30 more pupils than its official quota as it has the spare capacity to absorb them. Connaught School is undersubscribed by 90 places, and the brand new Hoe Valley Free School that has only just opened last September is undersubscribed. Currently there are a total of 736 vacancies at the nearest secondary schools in the western parishes of Guildford plus the 480 technical college places, a total of 1216 free places at this time or in the very near future!

In addition, SCC have approved plans for the expansion of both the Guildford County School on the west side of Guildford and St Peters School in Merrow. Also the birth rate in this area has fallen, not increased in the last 2 years, and the recent EU referendum result will likely enable this country to place sustainable limits on future population increase due to migration from EU counties. There is no proven need for a secondary school in this area therefore no justification for housing in our Green Belt Land!

Services, electricity, gas, water, sewage etc. are all at capacity we have been informed, the top of Glaziers lane water pipe has continued to break presumably due to the increased pressure being put through the pipe at peak times to meet the increasing demand for this essential service to our existing housing. This couldn't cope with any further demands. The area between Glaziers And Westwood Lanes has a high water table and is prone to flooding, covering this area with concrete and tarmac will only make this problem worse and even if a need for a secondary school were proven, and we suggest it is not, it would need sports playing field facilities which would not be possible on this often water logged land. This land is the natural water course off the Hogs Back hill, an area as previously stated, of outstanding natural beauty in the Surrey Hills. The area has ancient and natural woodlands within it, these may be earmarked to be preserved within the proposals but how can they be enjoyed surrounded by concrete, bricks and tarmac. The wildlife won't be fooled into staying in an urbanised area just because we keep the woods and not the surrounding fields that we currently enjoy, the open space we moved here to live within.

To meet their quota for new housing GBC appear to be concentrating development to a small number of larger development sites. It would be much fairer and acceptable to all concerned to allocate, and share equally, development to all parishes within the borough rather than destroy large areas of our countryside. Using controlled, small scale, infilling within all of the parishes would preserve our beautiful countryside and the larger open spaces. This may mean that GBC need to look at increasing staffing levels in planning and building control departments, we accept this, but this could be a short term increase for 10 - 15 years whilst the larger number of smaller developments are being built, rather than the permanent destruction of our countryside and green belt. The needs and wishes of SCC and GBC residents need to be considered over and above GBC workload. A smaller number of large scale development sites makes work for GBC staff easier we accept but this is not an argument or reason to permit the permanent destruction and loss of our environment. Multiple smaller scale developments shared across all of the borough would be fair and just to all residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1425  Respondent: 15231233 / Jenny Bridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the 2016 Draft Local Plan strongly. I am extremely concerned with regard to the following points:

1. The infrastructure including schools, medical facilities, public transport provision, road network etc are at capacity already and the proposed plan would push these beyond any reasonable demand.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 15231233 / Jenny Bridge</th>
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1. The green belt is a major reason why many people invested in their property at significantly higher than average premiums. To carry out the plan in the affected locations will impact significantly and irreparably on many thousands of peoples lives with out them having real involvement in the planning or decision making. This is nothing short of dictatorial.

2. There is no concrete demonstration that the housing need is not met in the areas – any development would be of they type that would attract overspill from London and the suburbs to the areas and not be catering to local demand/requirement.

I trust my voice will be added to the thousands objecting.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPA16/508</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I object to the lack of immediate provision for new schools.
I object to the lack of immediate provision for Doctors Surgeries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/507  Respondent: 15231489 / Alan Road  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of any evidence for the alleged housing needs numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/506  Respondent: 15231489 / Alan Road  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object, most strongly that Wisley, Clandon, Send and Riley, and many other villages, be removed from the Green Belt. This plan effectively merges all villages along the A3 from the M25 to the Hogs Back with no provision for any infrastructure improvements to either the A3 or local roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/708  Respondent: 15231489 / Alan Road  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the planned development of 400 housed at Garlicks Arch, with the consequence for traffic and effect on flooding.
I object to the proposed development of an industrial site in this ancient woodland, again, this will have massive impact on traffic and flooding.
I object, that should this plan be passed, the consequence for the people of these villages would be disastrous.
Please reply to this letter and ensure that it is placed before the Inspector for his consideration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/706  Respondent: 15231489 / Alan Road  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the massive new 4 way roundabout at Burnt Common.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1433  Respondent: 15231489 / Alan Road  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to all erosion of the GreenBelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1434  Respondent: 15231489 / Alan Road  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the disproportionate amount of development in one area of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/304  Respondent: 15231489 / Alan Road  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the newly revised Draft Local Plan. It makes sweeping changes to previous drafts and I further object that the consultation period of just six weeks to deal with this complex document of some 1,800 pages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/305  Respondent: 15231489 / Alan Road  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the last minute inclusion of new sites with less than 2 weeks notice.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/510  **Respondent:** 15232193 / Elaine Brightman  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

- I OBJECT TO the lack of immediate provision for new schools.
- I OBJECT TO the lack of any immediate provision for Doctors Surgeries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/509  **Respondent:** 15232193 / Elaine Brightman  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

- I OBJECT TO the lack of any evidence for the alleged housing need numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/1435  **Respondent:** 15232193 / Elaine Brightman  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
| Comment ID: | PSLP16/1436  | Respondent: | 15232193 / Elaine Brightman  | Agent: |
| Document: | Proposed Submission Local Plan: strategy and sites 2016 / Policy S2 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I OBJECT TO all erosion of the Green Belt
- I OBJECT TO any “in-setting” (I e removal) of any villages from the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | SQLP16/306  | Respondent: | 15232193 / Elaine Brightman  | Agent: |
| Document: | Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I OBJECT TO the disproportionate amount of development in one area of the Borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of up to 2100 dwellings

I object to the inclusion of the site formerly known as Wisley Airfield in the local plan as a possible site for the building of a large number of houses - basically a New Town. The planning committee have unanimously refused planning permission for houses to be built on that site so there is no reason to include it in the Local Plan. I object to the local council not making these reasons known - if there are any, which I doubt there are except possible financial considerations which have again not been made clear.

I object to the inclusion of the site formerly known as Wisley Airfield in the local plan as a possible site for the building of a large number of houses as 'localism', taking note of what the local people want, is supposed to be the new watchword in political circles especially after the Referendum vote showed exactly how out of touch the governors are with the governed. In this case the governed do not want a development on the airfield, Three Farm meadows, as particularly evidenced by the unusually high rejection of the people to the inclusion of it in the local plan. If the Council continue to fly in the face of local wishes they too will in the end suffer at the hands of the electorate in the same way as the Government did at their hands.

I object to the detrimental impact on transport, local roads and road safety. I specifically object to the proposition that the development will result in a meaningful shift to cycling and walking. The development is miles from anywhere and the residents will be entirely reliant on their cars to get about as there are no transport links of any kind except narrow roads and the enormously busy M25/A3 junction, which could not stand an influx of thousands of extra cars. There have in my experience in the last month already been two accidents on the section of the A3 between the M25 and the Wisley Roundabout and that is with the present amount of traffic.

Because the Olympic Cycle race and the Prudential Ride London-Surrey cycle race come through Ripley and past Ockham and Horsley, Cyclists are encouraged to cycle throughout this area and the number of cyclists on these narrow roads has increased dramatically especially in Saturday mornings, the favoured shopping time for most people, when large phalanxes of cyclist can be seen racing down the narrow lanes covering them from hedgerow to hedgerow. I object to the addition of any extra cars that will be a massive danger to these cyclists and discourage cycling in direct contravention of the governments aim to encourage it.

Wisley Gardens has proposed an expansion which will increase visitor traffic more than it stands today and so I object to any proposal that will increase the traffic any further and put an already over populated road junction under even greater strain making long stationary queues a probable permanent feature of this junction. Come and see what five thousand extra people visiting Wisley Gardens on special event days does to the M25/A3 junction as well as The Ripley Roundabout.

I object to the detrimental effect the development would have on there character of the area, what I believe the planners refer to as 'street scene'. ALL houses in Ockham, the nearest village, are old, vernacular, set back from the road, built in hollows or behind trees, are a maximum of two stories, with perhaps and attic conversion, and very sparsely arranged in terms of number of houses per hectare. This development is scheduled for the crest of a
It is urban in nature, has a population density equal to or greater than the most congested parts of London and will have living units up to five stories high; twice the height of anything in the area.

I object to the fact that even though the local people (those living in Ripley, Ockham, Wisley, and the Horsleys) do not want it, even though the planning committee have unanimously rejected it, STILL the Council are fighting tooth and nail to have it included in the Local Plan. Why?? As the ubiquitous phrase would have it - 'Follow the money'.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4051  Respondent: 15232513 / Barnaby Lawrence  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of Three Farms Meadows (otherwise known as Wisley Airfield) Development in the Local Plan and would like it removed.

I object to the fact that it is in the wrong place as it will be under the pollution cloud from M25 Junction10, it is constrained by ill-equipped country lanes, SSSIs, lack of public transport links.

I object to the injection of thousands more cars into transport links that are already often subject to overcrowding especially on warm sunny days when everybody and his wife visits Wisely Gardens and they intend to increase their visitor numbers.

I object to being too big and aggressively impacts the openness of the Green Blet, by being built high, along the skyline and to use the Council's own phraseology is of too great a 'Bulk and Mass'.

I object to the fact that the Council has no justification for removing the land from the Green Blet except that they want to.

I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.

I object that only a portion of the plan is being considered when it should be the totality of the plan that is under consideration. The Council have given to reasons for this when the changes are major changes.

I object to the Council ignoring the thousands of objections from private individuals and also the objections from statutory bodies requesting the removal of the site from the plan.

I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.

I object to the fact that the plan would appear to be full of inaccuracies - eg. in one part of the document the started number of houses is 12,426 and yet when the figures in the table are added up the total is 9,810. It is therefore not possible to consider the plan until it is presented accurately otherwise it is open to misinterpretation and challenge upon challenge because its foundation is so weak.
I consider for the reasons listed above and numerous other reasons that this plan is unsound and not fit for purpose. There are many many more objections to which I would add my name, but I have already done so over and over again and I am getting really really fed up with being forced to over and over again object and object and object.

The development is basically unsound and purely speculative and anyone who has no ulterior motive can see it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/515  Respondent: 15232897 / Jane Baynes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to highlight my objections to the new Guildford Borough local development plan recently published.

Permanent Damage To Green Belt; I object to the expansion of the Horsley village boundaries and its subsequent removal including Ripley, Send and Clandon from the greenbelt. There are insufficient details and or evidence within the local plan to support why this action is necessary and as such I strongly object to this recommendation. All this is doing is permanently destroying the greenbelt unnecessarily without any due care or attention to the consequences.

Disproportioned Number of New Houses For Local Facilities; I strongly object to the number of new houses being proposed. In particular within the Horsley, the schools, doctors and train stations are struggling to cope with current demand let alone the addition of circa 500 new houses in the area which on average would equate to another 1100 people using the local facilities.

Pollution; I object to the number of new houses being built on the grounds that the level of additional traffic and therefore unnecessary pollution will be substantial. Adding 2,000 houses at Gosden Hill farm, 2,000 at Wisley, 500 in Horsley, 400 houses at Garlicks Arch will have a significant impact on the environment due to the car pollution, both fumes and noise, that will be generated.

The proposed development plan is over kill and as such is directly out of proportion to the size and availability of brown field sites available for development.

I would ask that the council consider my objections and avoid destroying the Borough's green belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp173/350  Respondent: 15232993 / Grant Consultancy (Alastair Grant)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send Marsh/ Burnt Common

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The site known as ‘Send Business Centre’ comprises the main building complex to the north of Tannery Lane comprising some 7,400sqm floorspace, the industrial curtilage to its west, the car and truck park and storage to the south of Tannery Lane and the island to the north of the complex between the Canal and the New Cut; in all approximately 3.2ha (8 acres).

The site has been used for industrial purposes for over 200 years originally as a tannery. The present owners were tenants in 1939 and purchased the freehold in 1948, moving to Send at the outbreak of World War 2 on 5th September 1939. This was due to an explosion and fire at their existing plant in Arbutus Street, London which required the owners to find a new factory site.

At that time, most of the site was operated as a tannery processing rabbit skins. Following the purchase of the site’s freehold in 1949, the original tannery was gradually closed and the whole site turned over to the manufacture and processing initially of gum and resins to meet supply contracts with the MOD, the Admiralty, and Ministry of Food. Due to war shortages, goods arrived both by lorry and barge from the London docks and were unloaded along the site’s wharf for processing on the Island due to the contaminative nature.

After the war the site operated principally as a chemical grinding and milling works. These heavy industrial operations continued in tandem with other business uses of the site up until about 5 years ago, when the manufacturing operations ceased and moved to Teeside, thus freeing up the whole of the site to be used as a Business Centre.

The house known as Cheriton and its former garden has been part of the curtilage of the site since the last war and a barge dock was excavated into the former garden of Cheriton to facilitate barge turnarounds and loading. It was also used to transport Gum Damar to and from the northern site’s island curtilage for processing in one of the company’s industrial stills. The iron framework of the still remains in situ on the land forming part of the curtilage of the site between the River Wey Navigation canal and the New Cut. The still was operated remotely from the rest of the buildings due to the hazardous nature of the processes as volatile solvents were used in the process.

The area for the future expansion of the Business Centre therefore originally comprised ‘Cheriton’ a house and its former garden that was brought into the industrial complex and additional land to the west acquired in 1961. The former garden to Cheriton was used to extend and improve the wharf whilst the house provided lodgings for German and Italian prisoners of war working as indent labour on site. When the post war economic conditions improved in the 1970s and housing and labour became more freely available, Cheriton was occupied by the site’s security guard and factory foreman as part of the 24/7 manufacturing operations whilst its former garden continued to be used for industrial operations.

The open land adjacent to and west of Cheriton that was acquired by the company in 1961 was used to store pallets, burn surplus packaging and as open storage. This land had its western boundary planted with cypress trees to screen the open storage and industrial operations from the village in the 1960s and the road frontage was also fenced shortly after its acquisition. In order for it to be used as part of the industrial complex, large areas of hardstanding and road planings were put down to enable forklift access to move pallets and redundant packaging out of the works for disposal or to be burnt on the open land. The area is subject to low grade, but non-migratory, contamination as the result of its long term continuous use for pallet storage and waste consolidation and disposal and incineration. This land is still in use today as open storage, car parking and the hardstanding also provides access to the recently refurbished and enlarged barge dock granted planning permission in 2016. It is also used as an entrance for Tannery Studios by HGV construction vehicles.

That part of the site immediately adjacent to and south of Tannery Lane has been used as car and truck parking, open storage for pallets, chemical drums, packing and containerised goods for the entire length of time since planning consent was granted for it in 1961.

Over the years of ownership a wide range of planning applications have been made over the entire site’s curtilage varying from replacement buildings, car parking, etc. In 2006 permission to realign Tannery Lane to the site’s southern boundary...
was granted so that the entire complex can be operated without Tannery Lane running through the middle. This consent is still extant since a lawful start was made on the re-aligned road and correspondence with the council confirmed that to be the case. The company plans to complete the road re-alignment as soon as it has sufficient funds to do so to complete the consolidation of the site’s entire 3.2ha (8 acre site).

Send Business Centre presently provides for the employment needs for a range of start-ups and innovative business as well as more established companies. The site is focussing on the fast-growing creative digital sector with a view to providing a regional hub to meet the demand from the unique local supply chain of companies as well as liaison of the self-employed creative sector activities such as studios, video, sound & post production and app development. Moreover, LEP funding has already improved fibre infrastructure and promote innovation support at the site.

An important part of Send Business Centre is Tannery Studios (TS). TS is collaborating with both Enterprise M3 LEP and the Surrey Research Park based start-up incubator ‘Set Squared’ to develop TS’ facilities into a globally significant hub specialising in digital media / creative companies. Successful companies at TS will interact with locally based companies such as Guildford’s EA Games, thereby benefitting the Borough. However, site capacity within the existing buildings will be reached shortly and there is a need to provide much needed additional space to reflect the LEP priority of Digital employment in a sector that Guildford is especially strong.

TS already has numerous innovative and expanding companies such as:
• Lifelines Limited, a recipient of the Queens Award for Commerce;
• Tactic Games, the sales agent of the Angry Birds game;
• Ben Preston, the producer for Rhianna and music for the Harry Potter Films
• Alemba – VM software

The demand for multi-purpose studio space is forecast to grow exponentially due to demand from onsite companies and the localised supply chain. Send Business Centre extends to some 3.2ha, and comprises over 7,400 sqm of B1 and R&D employment floorspace. The Local Plan refers to ‘Strategic Sites’ as those that account for over 100 jobs. By comparison, Send Business Centre presently employs 195 people and is therefore well above the minimum parameters for being designated as a ‘Strategically Important Site’ in the Local Plan. Moreover, as referred to above, it is the home of a number of innovative and expanding companies who provide local employment and contribute significantly to the local borough and national economies.

The appeal of Send Business Centre is demonstrated by research that the creative businesses prefer “interesting space” over traditional office stock. Send Business Centre has played to its unique strength of canal views and is also developing its green credentials to attract the next generation of millennials and the creative class.

Send Business Centre is a major recipient of The Enterprise M3 Local Enterprise Partnership (LEP) support and Government funding through the LEP. In 2013, the Enterprise M3 LEP Board decided to proceed with two projects as being recipients of a total of £6.8M funding, Tannery Studios - which is an integral part of Send Business Centre - was one of the two recipients. The allocated £1.3 million is being used to create a purpose built 1,900 sq. m Innovation Centre at Send Business Centre that will deliver a range of bespoke facilities specifically designed to support the needs of high growth creative companies. The facilities will include video studios, sound studios, a live room, editing suites, innovation units and offices which will benefit local ACM and University of Surrey’s Tonmeister Course graduates. Additionally, Guildford’s recognised world strength in the computer games industry through ties to TIGA and the fast-growing audio-visual creative sector.

Commenting on this project Geoff French, Chair of the Enterprise M3 Board, said: “I am very pleased to announce that the Enterprise M3 Board has approved a further two projects to receive funding from our Growing Enterprise Fund. These projects are very exciting examples of what both the private and public sector are doing in the Enterprise M3 area to stimulate long-term economic growth. In our Strategy for Growth, the LEP has identified four key priority areas – enterprise, skills, innovation and infrastructure – that we will be addressing to deliver economic growth in the Enterprise M3 area. Both of these two successful bids that we are announcing today is focused on at least one of these areas and therefore is a very worthy recipient of Growing Enterprise Fund funding.” This all points to the strategic importance of Send Business Centre and reinforces the need for it to be recognised as such. Not only does it provide significant floor space and jobs well in excess of the requirements of the
Local Plan but perhaps it is how that space has been and will be continued to be used that justifies its inclusion as a Strategic site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/351  Respondent: 15232993 / Grant Consultancy (Alastair Grant)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send Marsh/ Burnt Common

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Analysis
There is an acknowledged lack of suitable and diverse employment sites that discourages investment from new companies in the Borough and encourages existing firms to relocate to other parts of the UK or overseas. Moreover, the lack of supply is hampering the aspirations of ‘start-up’ businesses. Accordingly, it is right to look at potential land, including those sites in the countryside that provide for sustainable development locations and provide enough employment land to meet the expected employment needs of existing and new residents. This is particularly the case where a number of established employment sites in the countryside can provide for sustainable expansion without harming countryside interests. The rural wards of the Borough accounted for almost half of the new jobs created in Guildford Borough between 2002 and 2008 according to the Guildford Economic Strategy 2011 - 2031.

In the short term, the need for employment land may be met through the intensification and redevelopment of existing sites and the protection of employment use on key strategic sites. This relates to both urban sites and established employment sites in the countryside. In this regard, it is anticipated that with the more efficient use of the existing space at Send Business Centre that a limited amount of more modern space can be made available. However, it is acknowledged by the research undertaken that this and similar sites elsewhere are unlikely to be sufficient in the medium to long-term and does not allow for any choice for potential occupiers or flexibility within the digital studio market. The land on the western side of Send Business Centre is therefore ideally placed to provide choice for businesses to start up as well as supporting existing businesses to expand. Such expansion would be in accordance with para 3.35 of the previously published Local Plan Strategy and Sites Issues and Options paper that advised “…. the Local Plan needs to continue to support job creation and business in rural areas.”

The case for expansion of Send Business Centre and Tannery Studios is:
• the shortage of the specialist studio facilities within the borough and wider afield to meet identified demand
• the need for Tannery Studios to improve its production facilities to meet that demand
• the potential of Tannery Studios in providing for growth
• the pool of expertise and facilities already present at Tannery Studios
• the economic benefits of employment particularly job creation builds on an area which Guildford is already particularly strong and foresees expansion in the years to come with a projected growth of the digital film, television and throughout the media industry
• Government’s policy of supporting sustainable economic growth and support for the creative industries
• the existing legacy electrical infrastructure from the site’s manufacturing history offers the large scale resilient power required for lighting and digital storage. The site also offers resilient fibre having invested heavily in two alternative internet routings.

The planned expansion onto the site’s western curtilage is likely to provide in the order of an additional 6,500sqm (70,000 sqft) of business space as outlined in the Design Principles below.
Key Design Principles

The western part of the site is generally flat, is not liable to flood and as referred to above has formed part of the industrial complex for many decades. It is bounded on its northern side by the canal, its eastern side by the existing built complex, Tannery Lane to the south and a belt of trees along its western boundary.

Beyond the western boundary, construction has commenced implementing planning permission for a new marina, chandlery buildings and car park for 70 cars. The proximity of the canal (which forms part of a conservation area), the site’s location within the Green Belt and adjoining and adjacent land uses and feature have all informed the layout of the proposed expansion of the site. Wey Estates Ltd. are in discussions with the owners of the marina development to collaborate with this development with the objective of making use of their permitted dual use 70 space car park in connection with Send Business Centre thus meeting sustainability objectives whilst minimising demands for car parking in the Green Belt and allowing a safe cycle route through both sites.

Since there are well founded policies in the Development Plan to resist the loss of residential buildings, Cheriton is to be relocated to a more appropriate location on the edge of the site and thus there will be no loss of residential accommodation.

Buildings

The council have recently issued a Lawful Development Certificate for external and internal improvements to the existing Business Centre complex for use as design studios and other related facilities. This will bring into use some additional 1,900sqm (20,500 sq ft) redundant and underused space within the existing built complex.

As to the expansion of the Business Centre onto its adjoining site, the Masterplan envisages that this can provide an additional 6,500 sqm (70,000 sq ft) of new business space, primarily used in connection with Tannery Studios contained within 8 separate but linked buildings to provide flexible accommodation to future tenants but with an emphasis on the space being used to provide bespoke facilities specifically designed to support the needs of high growth creative companies associated with the digital sector. The new space will therefore cater primarily for this sector providing:

- the production of web-based video and sound content
- film production
- television productions
- video games and digital content services
- sound post production and additional studios
- music

over and above what are presently planned within the refurbished buildings which can only offer small floor plates below 2,500 sq. ft. Together with the refurbished space means that the site can deliver a significant and strategic component to the Borough’s specialist employment needs which is not met elsewhere within the borough.

The expansion space will predominately be 80% to 90% either Class B1 and R&D business uses. A small ancillary use of sui generis, and/or class D will provide amenities such as a yoga studio / staff gymnasium or public / exhibition space / crèche or nursery. Having regard to its countryside and Green Belt location, the proposed units will be linked will by glass atriums thus allowing views between and around the buildings. In terms of built ‘footprint’ there will only be 20.5% site coverage by business buildings meaning that approximately 80% of the site will be free of buildings thus maintaining as far as possible the openness of the site.

In terms of the bulk and scale of the buildings it is anticipated that the accommodation can be contained in a mix of two and three floors and it is anticipated that the buildings will not need to exceed the height of the existing buildings on site.

The architects have arranged the accommodation in such a way to maintain the ‘canal-side’ setting of the existing buildings with the footpath adjacent to the wharf and new barge dock extended along the canal side to the extent of the site boundary.

Landscaping will be an important component of the Masterplan. Not only will the site boundaries be soft landscaped with indigenous broadleaf trees and hedgerows but the parking and turning areas will similarly be soft landscaped cognisant of the site’s semi-rural location. Movement

The site is located some 600m north east of the A247 through Send and is reached via Tannery Lane. The first half of the route from the junction with A247 has commercial and residential frontages but then the road becomes a rural lane with hedgerows on both sides. There is an existing (unsurfaced) public footpath which runs along the south eastern side of this section of Tannery Lane, beyond the roadside hedgerow.
The existing business park development comprises some 7,400sqm of employment floor space currently in B1 and R&D type uses. The site employs a minimum of 195 people and there are approximately 170 car parking spaces. Tannery Lane runs effectively through the middle of the site being immediately adjacent to the buildings and between the buildings and the car parking. Due to the site’s historical B2 and B8 uses, it continues to generate a significant number of HGV movements every day, although HGV use is declining as the site moves to business within the B1 and R&D classes.

Because Tannery Lane effectively divides the existing business park site into two, it compromises the owners’ ability to develop and improve the site in a comprehensive manner. Accordingly, planning permission was obtained to divert that section of Tannery Lane to a new alignment running along the south eastern boundary of the site. That consent remains extant because a lawful start was made on its construction and a Lawful Development Certificate was issued at that time by the Council. The company plans to complete the road realignment when it has sufficient funds to do so as part of the consolidation of the entire site. This would improve the overall efficiency and safety of Tannery Lane through that section of the highway.

A requirement of the road realignment consent is that the length of the existing Tannery Lane which becomes bypassed should be formally stopped up. The land will then revert to the company’s ownership and can be incorporated into future improvements of the site. The current Master Plan is based upon a minor adjustment to the alignment of the proposed new section of road, moving it a small distance to the south east so as to maximise the site. Access into the Master Plan area will remain in the same location, however, as on the currently approved road realignment scheme.

The latest Master Plan layout drawings indicate an expansion of some 6,500sqm gross floor space for the Business Park and an additional 200 or so car parking spaces. Whilst that level of car parking provision is a little below the Council’s parking standards (one space per 30sqm) comparison with the existing use of the Business Park site indicates that what is proposed will be sufficient to meet demand. Moreover, the owners are collaborating with the developers of the adjoining site such that there is a likelihood that an additional 70 spaces will be available for use in connection with the Business Park.

The current floor area of 7,400sqm has 170 car parking spaces associated with it and experience proves that this is sufficient to meet the demand. That level of car parking is a ratio of one space per 44sqm. The 200 car parking spaces proposed with the new floor area of 6,500sqm is a ratio of one space per 33sqm, and the resulting car parking provision for the expanded Business Park as a whole (comprising a total of 14,530sqm with 370 car parking spaces) is a ratio of one space per 39sqm (leaving aside the additional 70 spaces on the adjoining site). That is an increase of some 16% in the parking ratio compared with the current provision.

The new development will, of course, incorporate a range of effective travel planning measures to reduce car usage, together with cycle parking in accordance with the Council’s standards.

As previously described the site is some 600m from A247 in Send where there are hourly bus services operating between Woking and Guildford. The site is also just 4.3km from Clandon Railway Station which operates four trains per hour in each direction between Guildford and London Waterloo, as well as being approximately 5km from the major rail interchange at Woking where there are some 15 trains per hour to London Waterloo at peak times. Both of those stations are within comfortable cycling distance of the site and offer opportunities for people to get to and from work without using cars. The site already has in place a green travel plan and is in discussions with another employment site in Send regarding running a peak hour direct bus service to Woking and Guildford city centres. The majority of car trips generated by the existing Business Park travel via Tannery Lane to and from the A247 at Send. Although much of this section of Tannery Lane is a narrow rural road it accommodates the existing levels of traffic without undue difficulty. There have been no injury accidents along that section of Tannery Lane between the Business Park and the A247 junction or in the car park adjoining Tannery Lane during the last five years. As part of the Master Plan proposals it is intended that improvements will be carried out to the extent that this is feasible within the existing highway boundaries and these measures will improve forward visibility around bends and create passing bays.

Whether or not improvements are required at the junction of Tannery Lane with A247 will depend upon the outcome of a detail Transport Assessment. Previous development proposals for the wider area demonstrated that practical measures to improve capacity and safety can be achieved at the junction if justified. The proposal is likely to reduce the demands of HGV’s as the businesses that would occupy the newly designed buildings would be more R&D based rather than industrial. Access is likely to be primarily from the A247. Deliverability and Phasing
The first phase of the improvements to Send Business Centre by bringing back into use the redundant space is presently under way and it is anticipated that this will be completed by 2018.

In terms of phasing the new build units on the open land to the west, it is anticipated that this would be phased over a 10 year period, commencing in 2020 thus ensuring the deliverability of the employment space within the currency of the Local Plan by 2030.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: masterplanv8.pdf (2.7 MB)

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Comment ID: pslp171/1060  Respondent: 15232993 / Grant Consultancy (Alastair Grant)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We support the inclusion of Send Business Centre as a Strategic Employment Site as part of Policy E1(5) and its designation on the Policies Map.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1061  Respondent: 15232993 / Grant Consultancy (Alastair Grant)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We are concerned with the inference given in Policy E2 that there will be some form of ‘sequential test’ in considering proposals for employment development on designated Strategic Employment Sites (unless it is for development of less than 200sqm). This is at odds with other parts of the Employment policies. If otherwise acceptable proposals come forward on a Strategic Employment Site, why should such proposals need to be ‘sequentially tested’?

For example, Send Business Centre provides for the creation and development of small and local businesses by encouraging a range of types and sizes of new premises including incubator units, managed workspace and serviced office accommodation – precisely the type of business accommodation identified under Policy E1(3) that the Plan says: ‘will be supported’.

Similarly, Policy E5(1)(a) says the sustainable growth and expansion of all types of business and enterprise in rural areas
will be supported, through inter alia provision of well-designed new buildings of appropriate scale, provided they are in accordance with (where relevant, green belt policy) and other policies in the plan.

Furthermore, it is noted that Industrial, warehousing and storage development is not ‘sequentially tested’. (see Policy E2(5). We believe that if employment proposals otherwise meet with other policies in the Plan, then there is no need to sequentially test employment development on Strategic Employment Sites.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/1059</th>
<th><strong>Respondent:</strong></th>
<th>15232993 / Grant Consultancy (Alastair Grant)</th>
<th><strong>Agent:</strong></th>
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<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

We support the change to the Policy Map that indicates that Send Business Park is now inset from the Green Belt. The extent of the land inset from the Green Belt is broadly contiguous with the long established industrial curtilage of these business premises and which has been used initially for industrial and latterly for a wider range of business purposes for very many years. This is elaborated further in the attached Masterplan for Send Business Centre that was prepared at the request of the Borough Council in January of this year and which the subsequent Employment Topic Paper commented: 

"Initial master planning ideas show sensitive design to complement the surroundings.”

There has been concerns expressed by some local residents over the proposed change to the Policy Map in relation to Send Business Centre, these focussing on:

- **It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation**
- **There is highly restricted vehicular access along Tannery Lane in both directions**
- **Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate**

Looking at each of these concerns in turn, we would like to comment as follows:

**It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation**

In response to these concerns it is right to say that the business complex has been established at the site for many years: indeed, industrial activity at this site has continued without a break over the past 200 years or so. The premises - and the local / village employment it brings - has therefore served the local community and the rest of the borough since time immemorial. Whilst it is acknowledged that local people value the attractive appearance of the surrounding countryside, by any reasonable test the same could not be said of the appearance of the site and its curtilage which is used for car parking, open storage and industrial buildings. Nevertheless, change can be the impetus for improvements: the land between the canal and the River Wey is also within the ownership of SBC and is testament as to how the present owners have invested in improving the appearance of the site in collaboration with The National Trust such as the public garden the owners have installed by Tanyards Bridge. These improvements are set to continue if the proposal to inset the site from the Green Belt is confirmed with opportunities for further improvements and landscaping of the site. The recently published (July 2017) Rural Economic Strategy for the Borough specifically identifies Send Business Centre where improvements are being made. Page 25 of the Strategy highlights the site as a Case Study commenting as follows:
“There is a strongly supportive and sustainable rural business and community atmosphere among current tenants and, with funding support from the Enterprise M3 Local Enterprise Partnership, the family owners are bringing to fruition ambitious plans to develop a creative hub hosting hi-tech film and video studio and post-production facilities. Collaboration with the National Trust has resulted in canal-side improvements that are being further enhanced by the building of a marina to provide moorings away from the main waterway”. (see page 25 Rural Economic Strategy published by Guildford Borough Council, July 2017).

There is highly restricted vehicular access along Tannery Lane in both directions.

As to the vehicular access to the site along Tannery Lane, this issue has been specifically addressed by highway experts Bellamy Roberts who have been advising the owners regarding access and traffic issues and is referred to in detail in the accompanying Masterplan under the heading ‘Movement’. In this regard, it is important to point out that:

1. Historically, the site generated significant HGV movements in the past associated with the previous industrial processes that were carried out on site. Due to the site’s historical B2 and B8 uses, it continues to generate a significant number of HGV movements every day, although HGV use is declining as the site moves to business within the B1 and R&D classes.

2. Planning permission was obtained to divert a section of Tannery Lane to a new alignment running along the south-eastern boundary of the site. That consent remains extant because a lawful start was made on its construction and a Lawful Development Certificate was issued at that time by the Council. The company plans to complete the road realignment when it has sufficient funds to do so as part of the consolidation of the entire site. When completed this will bring about significant improvement to highway and pedestrian safety.

3. The site already has in place a green travel plan and is in discussions with another employment site in Send regarding running a peak hour direct bus service to Woking and Guildford city centres. The new development will incorporate a range of effective travel planning measures to reduce car usage, together with cycle parking in accordance with the Council’s standards.

4. Although much of this section of Tannery Lane is a narrow rural road it accommodates the existing levels of traffic without undue difficulty. There have been no injury accidents along that section of Tannery Lane between the Business Park and the A247 junction or in the car park adjoining Tannery Lane during the last five years. As part of the Master Plan proposals it is intended that improvements will be carried out to the extent that this is feasible within the existing highway boundaries and these measures will improve forward visibility around bends and create passing bays.

5. Furthermore, additional improvements are likely to take place at the junction of Tannery Lane and the A247 arising from other developments within the village.

Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

It is acknowledged that additional buildings will be associated with the planned expansion on the adjoining ‘curtilage’ land. Nevertheless, as acknowledged by the council, “the Initial master planning ideas show sensitive design to complement the surroundings.” Moreover, NPPF acknowledges that the limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land) such as Send Business Centre can be considered to be appropriate development in a Green Belt provided that certain conditions are met.

The council are however, taking the correct approach by ‘insetting’ the site from the Green Belt acknowledging not only the fact that the site has over the past two centuries performed an important role in providing much need employment for local people but that it can perform perhaps a more important role in the future by, for example, continuing to provide low-cost serviced office space with high-speed broadband access, with many of the existing companies have been supported from a great range of industries, with occupiers including Queens Award winners in healthtech, finance, property, insurance companies and start-ups. The site’s current focus is the creative digital creative sector: a key building block in the Borough’s economic growth.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
We would like to make the following comments in relation to the updated Employment Topic Paper that was published at the same time as the amendments to the proposed new Local Plan.

In relation to paras 4.43-4.49 dealing with Send Business Centre and Tannery Studios, Tannery Lane, Send the following points are made:

1. At para 4.43 it is wrong to suggest that the 1.4 ha site identified in the earlier draft Local Plan is “undeveloped”. With reference to the Masterplan accompanying these representations it is clear that the land in question has been long established as part of the curtilage of the business premises and continues to provide important functions in connection with Send Business Centre such as for storage and access to the wharf: indeed there are already a number of buildings on the site already.

2. In both Topic Papers there is reference to the site previously being located in ‘high sensitivity green belt’ although the Plan now acknowledges that due to the unique circumstances that arise in the case of Send Business Centre, the site is suitable to be inset from the Green Belt. We question however, the initial assessment of the site’s location being ‘highly sensitive’, given that the site is sandwiched between 2 landfill sites from former mining operations. It is of course not a definition used in NPPF or other guidance from the Government regarding Green Belts. Moreover, it is neither within the AONB or AGLV and as referred to above part of the curtilage of long established industrial premises immediately adjacent to extensive former and worked out gravel quarries. In the circumstances, we believe it is wrong to describe the Green Belt hereabouts as ‘high sensitivity’. If it is based upon a subjective assessment on the purposes of including land within the Green Belt, then clearly the site today performs poorly in that regard since it is already substantially developed, its expansion will not lead to the merging of settlements (the nearest settlement to Send is Old Woking, but this is located to the north and separated from the site by extensive areas of undeveloped land), nor will it lead to encroachment onto the adjoining countryside since the site is contained within the curtilage of the existing business complex.

3. Para 4.47 of the Employment Topic Paper says that “There are existing buildings on the site, mainly unused.” On the contrary, all the buildings at Send Business Centre are fully occupied (other than a limited number of units presently being refurbished). The Masterplan explains why there is a need to provide additional accommodation to meet the demand from both existing and new tenants looking to either expand or relocate to SBC (see representations above and references in the Rural Economic Strategy).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/1448  Respondent: Wey Estates Ltd (Michael Hamburger)  Agent: Grant Consultancy (Alastair Grant)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Please see the attached documents

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Representations on behalf of Wey Estates Ltd.pdf (612 KB)
Document 4.pdf (290 KB)
Document 1.PDF (245 KB)
Document 2.pdf (1.1 MB)

Comment ID: PSLPP16/2040  Respondent: Wey Estates Ltd (Michael Hamburger)  Agent: Grant Consultancy (Alastair Grant)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am Michael Hamburger and have been both a director and shareholder of the companies occupying the site for over 40 years. I am now aged 72 and spent much of my childhood playing on the site and observed first-hand the industrial use and evolution of the entire site's curtilage since my childhood.

The curtilage of what is known as Send Business Centre comprises the main former works to the north of Tannery Lane of some 80,000 sq.ft of buildings, mainly open storage land to the rear and side of Cheriton; the car and truck park to the south and opposite the main factory complex and the island to the north of the works between the Canal and the New Cut; in all approximately 9 acres. (Cheriton, a dwellinghouse, is now no longer part of the industrial curtilage).

My family's business was initially a tenant of the site and first occupied the land in 1939. The freehold was purchased in 1948 during which time it had operated as a chemical grinding and milling works. This use continued for over 60 years until 2008 when our manufacturing operations moved to Teesside. Since then it has operated as, and is now known as 'Send Business Centre'.

We originally moved to Send at the outbreak of World War 2 on 5th September 1939. This relocation occurred due to an explosion and fire at our previous plant in Arbutus Street, London. The family needed a new factory site and decided on Send, at that time most of the Tannery Lane site operated as a tannery processing rabbit skins. The island section of the site's curtilage was in use from the seventeenth century up to the 1950s for lagoon settlement pits for the fleshings resulting from degreasing the rabbit skins prior to tanning.
Following our purchase of the site's freehold, we gradually closed the original tannery and turned the whole site over to the manufacture and processing of initially gum and resins to meet supply contracts with the MOD, the Admiralty and Ministry of Food. Due to war shortages, goods arrived both by lorry and barge from the London docks and were unloaded along the site's wharf for processing.

The site's current built footprint replaced the outworn wood and brick tannery buildings over a 20- year period terminating in the 1970s. Following the rebuild the site was used for processing agrochemicals such as herbicides and biocides.

The house known as 'Cheriton' was part of the site curtilage since the 1930s. Cheriton's curtilage originally extended down to the canal, but this was much reduced in size when the company decided to excavate and extend the barge dock to receive goods and facilitate barge turnarounds in the 1960s. The former curtilage of Cheriton was also needed to transport Gum Damar to and from the 'island' for processing in one of the company's industrial stills. The iron frame work of the Still is still present on the land forming part of the curtilage of the site between the River Wey Navigation canal and the New Cut (the island site). The Still was operated remotely from the rest of the buildings due to the hazardous nature of the processes as volatile solvents were used in the process.

The brickwork and iron structure of the 'Still' is still visible today on the island

Due to labour shortages during the War, Cheriton was used to provide lodgings for German and Italian prisoners of war working as indent labour on site. When post-war economic conditions improved in the 1970s and housing and labour became more freely available, Cheriton was occupied by our site's security guard and factory foreman as part of the 24/7 manufacturing operations but now on a much reduced curtilage. We retain ownership of the curtilage round Cheriton including the lawn and drive, to enable the new road to be built.

In 1961 the company needed additional land to expand the industrial processes and land immediately to the west of Cheriton was acquired for this purpose, primarily for open storage. Also in 1961 other land was acquired opposite (south) of the main factory complex for parking both of motor cars and the heavy commercial vehicles associated with bringing goods to and from the site. Planning permission was obtained to use this land for parking and it was hard surfaced.

The car park and container storage area, the permitted re-alignment of Tannery Lane runs behind the containers and car park

This part of the industrial curtilage to the south (opposite) the main factory complex of the site has been used for HGV parking as well as for open storage for pallets, chemical drums, and packing and containerised goods for the entire length of time since planning was granted back in 1961. Put simply, the site in its present use as a Business Centre and its previous use as a chemical processing mill would not have been viable without this land since it was the main parking and pallet/container storage area serving the site. The same could be said for the open storage area west of Cheriton.

In 1995 an additional small triangle of land was acquired adjacent to the car park/storage area to enable Tannery Lane to be moved to the south of the car park to improve the site's safe operation. Planning permission was applied for and granted for the realignment of Tannery Lane demonstrating the land to the south of Tannery lane was and remains part of the site's curtilage. The aerial photos below dating from over an extended period of time shows the historic use of the entire site's curtilage.

Note the open storage on the curtilage land west of Cheriton and the temporary structures on the same land in the photo below

The land acquired in 1961 west of Cheriton had its western boundary planted with cypress trees to screen the open storage and industrial operations from the village in the 1960s (see the photo immediately below showing the cypress tree sc
The road frontage was also fenced shortly after its acquisition. This part of the company's land holdings has consistently been used as part of the site's industrial and business operations to date.

Entrance to the Cheriton curtilage buildings occupied by Complete Building Solutions Ltd.

In the mid-1960s large areas of hardstanding and road planings were laid to enable forklift access to move pallets and redundant packaging out of the works for disposal or to be burnt on the site. This is very evident in the first of the aerial photos above. These operations, together with the periodic renewal and maintenance of the hard surface continued up until 2008 when the chemical grinding and milling works relocated to Teesside. The area is subject to low grade non-migratory contamination as the result of its long term continuous use for pallet storage and waste consolidation and disposal and incineration. Since 2010, this part of the site has remained in use as parking and open storage. The hardstanding also provides much needed access to the newly improved barge dock for which planning permission was granted in 2015 to be further enlarged and improved. It also functions as a secure fire escape from the rear of the buildings.

Over the years of ownership, a wide range of planning applications have been made over the entire site's curtilage varying from a helicopter landing pad on the open storage land adjacent to Cheriton to a planning consent to realign Tannery Lane to the site southern boundary so that the entire curtilage can be operated as one unit without Tannery Lane running through the middle. This consent is still extant since the council has subsequently agreed that a lawful start on it was made. The company plans to complete the road re-alignment as soon as it has sufficient funds to do so to complete the consolidation of the site's entire 9 acre curtilage.

*It has just occurred to us that you may wish us to explicitly state that in our view the Submission Plan is unsound although that would of course be obvious from the representations we have made. I would also add that we are happy to attend and make oral submissions to the Inspector if he feels that would be helpful to him in considering the points we raise.*

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Document 3.pdf (1.3 MB)

Document 1 (3).pdf (249 KB)

IMAGE_1.jpg (217 KB)

Document 4.pdf (295 KB)

IMAGE_2.jpg (195 KB)

IMAGE_7.jpg (265 KB)

IMAGE_3.jpg (131 KB)

IMAGE_4.jpg (160 KB)

IMAGE_5.jpg (174 KB)

Document 1 (3).pdf (249 KB)

IMAGE_6.jpg (192 KB)
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

see attached document, paras 43-46 in particular

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  Representations on behalf of Wey Estates Ltd.pdf (612 KB)

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Comment ID: SQLP16/307  Respondent: 15233025 / Wey Estates Ltd (Michael Hamburger)  Agent: Grant Consultancy (Alastair Grant)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

The plan is unsound since it does not make sufficient provision for suitable employment land

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/900  Respondent: 15233025 / Wey Estates Ltd (Michael Hamburger)  Agent: Grant Consultancy (Alastair Grant)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( Yes ), is Legally Compliant? ( Yes )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E1: Meeting employment needs

We support the inclusion of Send Business Centre as a Strategic Employment Site as part of Policy E1(5) and its designation on the Policies Map.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
We are concerned with the inference given in Policy E2 that there will be some form of ‘sequential test’ in considering proposals for employment development on designated Strategic Employment Sites (unless it is for development of less than 200sqm). This is at odds with other parts of the Employment policies. If otherwise acceptable proposals come forward on a Strategic Employment Site, why should such proposals need to be ‘sequentially tested’?

For example, Send Business Centre provides for the creation and development of small and local businesses by encouraging a range of types and sizes of new premises including incubator units, managed workspace and serviced office accommodation – precisely the type of business accommodation identified under Policy E1(3) that the Plan says: ‘will be supported’.

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Furthermore, it is noted that Industrial, warehousing and storage development is not ‘sequentially tested’. (see Policy E2(5).

We believe that if employment proposals otherwise meet with other policies in the Plan, then there is no need to sequentially test employment development on Strategic Employment Sites.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P2 Green Belt

We support the change to the Policy Map that indicates that Send Business Park is now inset from the Green Belt. The extent of the land inset from the Green Belt is broadly contiguous with the long established industrial curtilage of these business premises and which has been used initially for industrial and latterly for a wider range of business purposes for very many years. This is elaborated further in the attached Masterplan for Send Business Centre that was prepared at the request of the Borough Council in January of this year and which the subsequent Employment Topic Paper commented: “Initial master planning ideas show sensitive design to complement the surroundings.”

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- It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
- There is highly restricted vehicular access along Tannery Lane in both directions
- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

Looking at each of these concerns in turn, we would like to comment as follows:

**It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation**

In response to these concerns it is right to say that the business complex has been established at the site for many years: indeed, industrial activity at this site has continued without a break over the past 200 years or so. The premises - and the local/village employment it brings - has therefore served the local community and the rest of the borough since time immemorial. Whilst it is acknowledged that local people value the attractive appearance of the surrounding countryside, by any reasonable test the same could not be said of the appearance of the site and its curtilage which is used for car parking, open storage and industrial buildings. Nevertheless, change can be the impetus for improvements: the land between the canal and the River Wey is also within the ownership of SBC and is testament as to how the present owners have invested in improving the appearance of the site in collaboration with The National Trust such as the public garden the owners have installed by Tanyards Bridge. These improvements are set to continue if the proposal to inset the site from the Green Belt is confirmed with opportunities for further improvements and landscaping of the site. The recently published (July 2017) Rural Economic Strategy for the Borough specifically identifies Send Business Centre where improvements are being made. Page 25 of the Strategy highlights the site as a Case Study commenting as follows:

“There is a strongly supportive and sustainable rural business and community atmosphere among current tenants and, with funding support from the Enterprise M3 Local Enterprise Partnership, the family owners are bringing to fruition ambitious plans to develop a creative hub hosting hi-tech film and video studio and post-production facilities. Collaboration with the National Trust has resulted in canal-side improvements that are being further enhanced by the building of a marina to provide moorings away from the main waterway”. (see page 25 Rural Economic Strategy published by Guildford Borough Council, July 2017).

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1. Historically, the site generated significant HGV movements in the past associated with the previous industrial processes that were carried out on site. Due to the site’s historical B2 and B8 uses, it continues to generate a significant number of HGV movements every day, although HGV use is declining as the site moves to business within the B1 and R&D classes.
2. Planning permission was obtained to divert a section of Tannery Lane to a new alignment running along the south-eastern boundary of the site. That consent remains extant because a lawful start was made on its construction and a Lawful Development Certificate was issued at that time by the Council. The company plans to complete the road realignment when it has sufficient funds to do so as part of the consolidation of the entire site. When completed this will bring about significant improvement to highway and pedestrian safety.

3. The site already has in place a green travel plan and is in discussions with another employment site in Send regarding running a peak hour direct bus service to Woking and Guildford city centres. The new development will incorporate a range of effective travel planning measures to reduce car usage, together with cycle parking in accordance with the Council’s standards.

4. Although much of this section of Tannery Lane is a narrow rural road it accommodates the existing levels of traffic without undue difficulty. There have been no injury accidents along that section of Tannery Lane between the Business Park and the A247 junction or in the car park adjoining Tannery Lane during the last five years. As part of the Master Plan proposals it is intended that improvements will be carried out to the extent that this is feasible within the existing highway boundaries and these measures will improve forward visibility around bends and create passing bays.

5. Furthermore, additional improvements are likely to take place at the junction of Tannery Lane and the A247 arising from other developments within the village.

It is acknowledged that additional buildings will be associated with the planned expansion on the adjoining ‘curtilage’ land. Nevertheless, as acknowledged by the council, “the Initial master planning ideas show sensitive design to complement the surroundings.” Moreover, NPPF acknowledges that the limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land) such as Send Business Centre can be considered to be appropriate development in a Green Belt provided that certain conditions are met.

The council are however, taking the correct approach by ‘insetting’ the site from the Green Belt acknowledging not only the fact that the site has over the past two centuries performed an important role in providing much need employment for local people but that it can perform perhaps a more important role in the future by, for example, continuing to provide low-cost serviced office space with high-speed broadband access, with many of the existing companies have been supported from a great range of industries, with occupiers including Queens Award winners in healthtech, finance, property, insurance companies and start-ups. The site’s current focus is the creative digital creative sector: a key building block in the Borough’s economic growth.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: masterplanv8.pdf (2.7 MB)
glossed over in the report that are not resolved by GBC recent actions. The impact on infrastructure, which is clear for all to see, only gets a passing mention. For example, the transport report by the developer's consultants has been torn apart following many comments and objections. Missing traffic numbers, grossly understating the impact of the development on trunk roads and local roads. The information provided in the Local Plan implies that if billions are spent on road and transport network improvement the development at Wisley could proceed with improvements funded by developers.

3.3. There appear to be 58 projects included in GBC wish list; statements have been made that for the housing program to move forward, it would require the majority of the programme of work to be delivered. At this point in time only 4 of the 58 projects have received committed funding even one of these is in doubt if Highways England is to be believed.

3.4. No solutions have been arrived at for the problems in the centre of Ripley. After more than 2 years of meetings and discussions involving SCC and the developer's consultants no workable solution has been identified. GBC local plan dismisses this significant problem saying it will be resolved with a "management solution". I would be very interested to hear what that solution could be and I suspect SCC highways would also be interested.

3.5. Both Highways England and SCC Highways issued holding objections in relation to the recent planning application for the Wisley site. This is, apparently, all they can now do as they are unable to refuse an application. If these two key agencies have expressed their grave reservation over the potential development on this site, why do GBC insist in promoting the site?

3.6. Under the latest Housing and Planning Bill, if sites are included in a local plan there is a presumption in favour of an application with matters of detail only to be resolved. Large slices of GBC traffic solutions are based on survey and analysis yet to be done when more detail can be made available. In other words they do not know the full extent of the problem. This information will be the result of a further examination of the issues and with solutions that are not currently apparent. I suppose this is the reason for the vagaries of the budgets. The only beneficiary of such an ill conceived and ill prepared approach will be lawyers representing the future developers when they are asked to pay for or contribute towards any mitigation.

3.7. The budget costings are said to err on the conservative side. Worked out on the back of a fag packet is more the case! How can anybody be expected to take a budget plan seriously when the individual projects have a budget plan estimate in the range of £100m to £250m on a single project. It is no wonder only 4 of the 58 projects have any commitment.

3.8. There are serious environment issues on the Wisley site and the nearby SPA. Pollution levels already exceed EU levels. The proposed SANG provision is immediately adjacent to the SPA a point that was criticized by Wildlife Trust, and Forestry Commission and initially by Natural England. The latter making a reversal of earlier comments following changes in personnel.

3.9. I therefore Object to the Wisley Airfield site being taken out of the Green Belt where it continues to serve the purposes intended by its original inclusion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1450  Respondent: 15233153 / Anthony Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I would like to raise the following objections to the above Plan:

1. Housing

1.1. The target for new homes outlined in the Local Plan represents a 25% increase in the housing stock of the borough; The Office of National Statistics ("ONS") projects a population increase (including that for economic growth) of some 15% for Guildford Borough over this same period. Why do we need the 25% increase in homes?.

1.2. The infrastructure proposals are inadequate even to meet existing needs let alone the proposed additional developments in the Local Plan.

1.3. Policy S2: is a Borough Wide Strategy (the “SHMA”), which looks at how the annual housing target of 693 homes is made up. It estimates that 517 homes per annum arise from ‘the demographic figure (supported by ONS office national statistics) projections. To this GBC plan has added another 120 homes per annum in order to ‘support extra economic growth’, a further 31 homes per annum to ‘improve affordability’ and 25 homes due to ‘student growth’, all of which totals up to 693 homes per annum target more than in the rejected plan.

1.4. This does not make any sense as we do not need an uplift for extra economic growth. Current growth patterns are included in ONS projection.

1.5. The increase of 25 homes to ease affordability issues will result in only 10 social/affordable houses being built. It would be better if planning permission was only granted for 1, 2, 3 bed properties for a period of 2 - 3 years with a restriction on the percentage of 4 & 5 bed if required . This would help to provide a better mix for both market and affordable homes in all parts of the borough.

1.6. Student accommodation should be provided by the university. The University’s expansion should be in line with what it can deliver in terms of extra student accommodation.

1.7. GBC Affordable Housing Policy H2 is proposing that all development sites (other than those with less than 10 units) will be required to have 40% of their homes offered as affordable housing. This to be on all site irrespective of where they are or where the homes are most needed. Local authorities are able to take payments in lieu from developers, but GBC have rejected this option. Why? This “one size fit all” policy will mean that homes will be built where they are not needed and not enough will be built where they are needed. Developers are therefore able to influence the level and type of affordable homes built. The housing mix in the Local Plan suggests more 1-bed homes should be built than 2-bed. GBC have ignored the figures from their own needs data (where more 2-bed homes are needed) in favour of those produced by their external consultants report. These reports have been influenced not by sound internal data from their housing records but by the vested interests of the development lobby. The only changes that can be made to the number on each site is at the developers discretion and at their request. GBC are unable to promote changes.

1.8. If any affordable social housing is built in a village like East Horsley and on most of the sites in West Horsley they could be lost to the market as there is no rural protection against the right to buy or enfranchise.

1.9. Most of the social housing in EH has already been lost as a result of right to buy. GBC should take payment in lieu from developers and build the social affordable home in more urban areas where they are most needed

1.10. GBC’s new policies will encourage the buy to let investors who will receive a good return on their investment.

1.11. POLICY H3: Rural exception homes are required on a small scale and can be retained as affordable and built on the edge of village and have significantly less impact on the Green Belt.

1.12. I therefore object to the proposed housing numbers and policies based on the above points.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):**

1. **Green Belt**

2.1. Proposed Submission Local Plan includes the statement “We will continue to protect the Metropolitan Green Belt”. No this is not the case. The housing policies set out in the Proposed Submission Local Plan; indicate that 65% of proposed new developments will take place on land that is currently in the Green Belt.

2.2. Under NPPF regulations GBC and other Local Authorities are permitted, once they have determined their Objectively Assessed housing Need (OAN), to make allowance for factors which may constrain the delivery of new housing. Constraints such as the need to protect the Metropolitan Green Belt, or the restrictions required to protect the Surrey Hills Area of Outstanding Natural Beauty, or land costs etc. Although these designated areas make up a large proportion of the land area of Guildford Borough, GBC has made no attempt to reduce its housing numbers in order to take account of such constraints. They have instead increased the number, beyond that required for normal growth projections to satisfy their own egotistical view on a path of massive economic growth.

2.3. Currently development is permitted within the settlement boundary, where villages are washed over by the green belt with particular planning regimes being applicable that have proved beneficial in preventing the urbanization of many villages. They are very successful, because of the non urban nature of small scale new development to help to retain the openness of the villages. These villages house, in some cases, a population of 4000 plus people, yet are regarded by residents as small villages. For those who drive through these areas they do not see a mass of urban style developments but trees and hedges, views between homes, views through spaces that don't reveal row upon row of homes but space and openness with trees amongst the homes and a variety of scale and architecture.

2.4. Washing some of the larger villages will result in them becoming their own urban sprawl as a result of disproportionate infilling.

2.5. Changes to settlement boundaries have been made in order to make more land available for the developers under the guise of making the boundaries more defensible. Many straight lines have now been drawn which result in villages developing hard edge profiles with buildings replacing the fragmented softer edge of the original hedgerows, trees and green fields.

2.6. Loss of Green Belt resulting from these boundary realignments can only be justified in exceptional circumstance. None of which have been provided. Moving a boundary from one already defined boundary to another, again can only be done in exceptional circumstance. Housing need has already been turned down as such an exceptional circumstance.

2.7. I object to all these changes being made to the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I very strongly object to the Guildford Borough Proposed Submission Local Plan (June 2016). I object on the following grounds

I object to the Local Plan as the development proposed is not sustainable (Policy SI)

The 13,860 new houses proposed is totally unsuitable- it will damage local communities by over development, particularly Ripley, Send and Clandon. The local communities do not need this number of houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan does not include anything to improve the infrastructure for Garlick’s Arch.

The development should be in urban areas not in green areas, where there is sustainable transport.

I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick’s Arch (A43).

I object to development in areas which are at risk of flooding (Policy P4)

The Plan does not take adequate account of flood risk as required by National Planning Policy.

The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan.

I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

North facing ramps to the A3 at Burnt Common would be a disaster for local communities, which do need to access the A3 to the north, but the addition will draw in a huge amount of 'through' traffic. E.g. all traffic from London/M25 to Woking would go through Burnt Common, Send and Old Woking. This is not sustainable as this cannot be improved.

I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

There is way too much traffic in our villages already and this plan will cause more congestion in Ripley, Send and Clandon, with no plan to improve that.

The rural roads in this area are narrow, in poor condition and have no footpaths. 5000 more houses means dangerous and unsustainable traffic.

I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

The Garlick’s Arch (A43) proposal would double the built area in the locality, and would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees.
I object to the Borough Wide Strategy (Policy S2)

GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

The Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing.

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages.

I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch is protected from development as Green Belt. There are no exceptional circumstances which allow for it’s removal from the Green Belt (Policy P2). Central Government state clearly that housing need is not an exceptional circumstance.

The Plan states the preference is to use of previously developed land, but GBC have removed a brownfield site at Burnt Common replaced it with Garlick’s Arch.

The site is not appropriate because:

- There is no sustainable transport
- The site is liable to frequent flooding
- The site has Ancient woodland and is a wildlife habitat, but no wildlife report for the site is in the
- There are no plans to improve local schools, medical or utilities to

I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans.

But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on the Plan.

I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no schedule for Garlick’s Arch (A43), so the Plan takes no account of the infrastructure required for this site. It is therefore not fit for purpose.

I object to poor air quality concerns (Policy I3)

The huge developments being proposed, particularly in the north east of the borough will lead to considerable further congestion and to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

I object to the employment strategy and impact at Garlick’s Arch (A43) (Policies E2 and E5)

There is no need for new industrial sites at Garlick’s Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000 sq m proposed. That site was removed from the Plan without any reasoning.

Furthermore the development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been for there decades employing local people and are therefore clearly sustainable.
I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

The A3 or M25 would have to be improved before any development is done. Highways England has no plans to even start considering improving the A3 before 2020. Clearly no real improvements are possible in the timeframe of this Plan so the developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), should not take place.

I object to the lack of proper infrastructure planning for sites (Policy I1)

The Plan does not identify adequate infrastructure improvements to support the huge scale of development, especially at Garlick's Arch (A43) which has no infrastructure projects in the Infrastructure Schedule to support it. Local services, utilities and sewerage, doctors etc. are at or close to capacity.

There are no plans to improve the capability of the medical and police/emergency services to cover the 5000+ houses in the north east of the borough.

I wish these objections to be fully taken into consideration and that the plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/517  Respondent: 15233217 / Mary Allwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Regarding the proposed building and alterations in Send.

I object to Send being taken out of the Green Belt. This is a lovely village in the green belt area - which is why I moved here.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/520  Respondent: 15233217 / Mary Allwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the increase in housing from 185 to 485 - these changes require another full consultation of regulation 18 and not the short cut of regulation 19 which you are trying to get away with.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/720  Respondent: 15233217 / Mary Allwood  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to more industrial units being built. There are a lot of empty units around our area so it is a completely useless idea and would make the roads much busier than they already are.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/721  Respondent: 15233217 / Mary Allwood  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I also object to the 4 way interchange on the A3 at Burnt Common as this would also cause a lot of traffic onto our small roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/719  Respondent: 15233217 / Mary Allwood  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the travellers site and 40 houses being built on a piece of land opposite Winds Ridge. Send Hill is much too narrow for this suggestion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/722</th>
<th>Respondent: 15233377 / Stephen Macfarlane</th>
<th>Agent:</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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As a local parent whose children are and will use the adjacent school, I would like to oppose this planning application for new housing.

currently it is very difficult to park or drop off and collect the children at peak hours.

any further housing is likely to add up to 2 extra cars per house using the existing limited infrastructure.

i do not see any proposals from the developer to aid or compliment the local ergonomics.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<table>
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<th>Comment ID: PSLPP16/1455</th>
<th>Respondent: 15233441 / John Mason</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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</table>
Infrastructure:

Glaziers Lane and Westwood Lane, which on the Plan are either side of the proposed project are totally incapable of taking the construction and subsequent residential traffic.

Westwood Lane has an irrevocable, narrow one way system under the railway bridge and on Glaziers Lane the bridge has a bend and blind spot.

The A323, the fundamental service and main traffic route through the village is extremely busy, speed limits are ignored and the main junctions are both potentially and actually dangerous.

There is no opportunity, without significant housing demolition to improve these routes and junctions which would be essential to attempt to accommodate an additional 2000 domestic and service vehicles.

Much of the proposed site is low lying and subject to flooding, the large increase in hard surfaces and the inability of the current surface and foul drainage systems to cope threatens a major disaster.

School:

Research by our County Councillor indicates that there is no fundamental need for a secondary school on the site and any calculation as to secondary education need will have to be revised downwards as a result of the Brexit decision.

The linkage of school need to Green Belt development is most definitely not proven.

Amenities:

Normandy is almost totally devoid of local amenities.

There is a perimeter bus and rail service, an overloaded doctors surgery, 2 churches and a well appointed village hall.

There are no services for the every day supply of food or drink.

All the latter needs are serviced outside the village requiring travel to access them.

Clearly Guildford has a commitment to provide housing for an increasing population but there are two fundamentals that have not been addressed:-

What is the demand for housing going to be when immigration is brought under control, an area for recalculation of demand.

Secondly housing in Guildford is extremely expensive and likely to remain so, as a construction professional, I doubt if low cost housing can be built (if resources are available) that is truly affordable.

I urge that any significant development in Normandy is not implemented as the fundamentally flawed logic for a secondary school on Green Belt is not proved and therefore the surrounding development does not need to go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
As a Normandy resident of more than 20 years I wish to object to the desecration that would be caused by the adoption of the proposed Local Plan and especially the devious way in which a late amendment was introduced.

Reasons:

1. Green Belt:

I have lived in Normandy for many years and I truly value our green belt its use for development would be irreversible.

There are brown field sites around which possibly could be used in and around the borough as a priority.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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6) I object to the lack of any immediate provision for new schools.

[...]

8) I object to the lack of any immediate provision for Doctors surgeries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
3) I object to the site A43 Garlicks arch, the proposal to build 400 houses and industrial space

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/725  Respondent: 15233633 / Hilary Head  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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4) I object to the site A43a the creation of new north and southbound slip roads to and from the A247 Clandon Road at Burnt Common ...this will greatly increase traffic problems in Send (A247) and Ripley as Send will become a through route for Woking for traffic leaving M25 and A3

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1464  Respondent: 15233633 / Hilary Head  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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2) I object to all erosion of the green belt.

7) I object to the wholesale destruction of the Green Belt in this area

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1463  Respondent: 15233633 / Hilary Head  Agent:
I would like my comments to be seen by the Inspector.

This plan has not been thought through, with potential major impacts on the villages of Send and Ripley. The traffic is already bad especially at peak times and also affected badly when A3 is blocked round Guildford.

I) I object to the 2016 draft local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1465  Respondent: 15233633 / Hilary Head  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

5) I object to the number of homes that the plan intends to deliver.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18616  Respondent: 15233633 / Hilary Head  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
5) I object to the number of homes that the plan intends to deliver.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID: PSLPP16/1469  Respondent: 15233889 / Claire Sallows  Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Forthly, I object due to the congestion that development will cause to both local and larger roads, A3/M25 (Policy I2)

The A3 or M25 must be improved before development is done. There are no plans to even start considering improving the A3 before 2020, so rendering the timescales are completely mismatched which means the developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), should not take place.

I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a) North facing ramps to the A3 at Burnt Common are likely to increase the amount of ‘through’ traffic. including but not limited to more traffic from London/M25 to Woking routing through Burnt Common, Send and Old Woking. This is not sustainable as this cannot be improved and current traffic is heavy for long hours every day.

The roads concerned are of increasingly poor quality and the additional volumes will cause further deterioration, leading to risk of vehicle damage, accidents, especially cyclists, and broader impacts to adjoining land, properties, etc.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID: PSLPP16/1470  Respondent: 15233889 / Claire Sallows  Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
This in turn creates my further objection to poor air quality concerns (Policy I3)

As the huge developments proposed (particularly in the north east of the borough) will lead to considerable further congestion and to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1467  
Respondent: 15233889 / Claire Sallows  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Secondly, I object to the failure to protect the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon, Wisley Airfield and Garlick's arch from the Green Belt. There are no stated exceptional circumstances for these villages and sites areas being removed, as stipulated in the National Planning Policy. There are many brownfield sites in Surrey (Guildford and Woking) which should be used before even considering removal of country areas such as Garlick’s Arch (A43).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1468  
Respondent: 15233889 / Claire Sallows  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Thirdly, I object to development in areas which are at risk of flooding (Policy P4).

I believe the Plan does not take adequate account of flood risk as stipulated in the National Planning Policy.

The flood classifications of Garlick’s Arch (A43) by the Environment Agency and the Council are different. As a resident of 20 years I have seen this area flooded many times and believe development will have a huge potential impact on the flood plains between Woking and Send, just creating a new problem in a slightly different place that will impact new and existing development for miles around. I see no evidence of this being taken into account.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/1466  Respondent: 15233889 / Claire Sallows  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Firstly, I object to the Local Plan due to lack of long term sustainability of the proposed development (Policy S1)

The number of new houses proposed is not sustainable as it will damage local communities by over development, especially Ripley, Send and Clandon, and with further impact to Old Woking. The traffic levels are unacceptable already, and funnel into Woking via a supposed Conservation area where Old Woking High Street is protected for historical reasons as a road designed for traffic volumes in the early 20th century.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/726  Respondent: 15233921 / Kiki Samantha Nicholson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I fully support the rejection by the entire planning committee of the development of Wisley airfield (Three Farm Meadows) to the inclusion of the site formerly known as Wisley Airfield in the local plan and object strongly to its continued inclusion.
I object to the inclusion of the site known as Wisley Airfield in the local plan as it goes against the published Ockham Parish Local Plan which we are encouraged to issue so that everybody has a clear idea of what local people actually want rather than what the Council think they want.

I object to the awful impact a development on Wisley will have on transport, local roads and road safety.

I object to the impact on the local environment such a development would have especially on the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

I object to attempts to remove Three Farm meadows (Formerly known as wisely airfield) from the green belt. The site is actually prime agricultural land that the government promised to remove the airstrip from it when they had finished with it and under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

I object to the mass of cars that will be unleashed on our narrow roads that are flooded with cyclists.

I object to more cars on our roads as there are no provisions for pedestrians and we take our lives in our hands when we walk the roads even with the traffic we have now and there is no room for pavements.

I object to the Council using inflated/dodgy statistics (West Surrey Strategic Market Housing Assessment (SHMA)) to base their need for so many houses.

I object to the proposition that the development will result in a meaningful shift to cycling and walking, of course it won’t as there are no transport links and the new residents will obviously use their cars.

I object to the fact that the houses that are proposed are completely out of keeping with the whole area.

I object to the fact that even though the planning committee have unanimously rejected it, even though the local people don’t want it, the Council are still determined to have it included in the Local Plan.

I object to the Council trying to force people to live in an atmosphere poisoned by fumes from the M25/A3.

I object to the fact that Guildford Borough Council are completely ignoring the Ockham Parish Local Plan.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/528  Respondent: 15233953 / Susan and Leslie Rush  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Guildford Urban Area

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We strongly object to the 2016 Draft Local Plan.

We are concerned that there will be a significant loss of areas currently designated as green belt particularly in Burpham. It seems that you want to merge local villages along the A3 into one, this will be detrimental to the area.

It appears that you plan to build 693 new homes a year. I believe this is more than double the figure given in 2012. Where is the justification for this. Burpham, Gosden Hill, seems likely to get a disproportionate amount of new housing/development and yet there is no provision for improving the road links and amenities. Burpham is already burdened with high levels of traffic, if your plan went ahead we would come to a standstill!

I believe there has been some discussion about building a tunnel to serve the Gosden Hill development, this would improve the traffic situation but we still feel that the Gosden Hill development is too large and is not in keeping with the area.

It also appears that the consultation time on such a complex development is rather short.

Is this draft plan still viable given the current political and financial situation?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
• I object to the lack of any evidence for the alleged housing need numbers

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/734  Respondent: 15234017 / Martin Head  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• I object to the site A43 Garlicks Arch

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/735  Respondent: 15234017 / Martin Head  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• I object to the site A43a the creation of new north and southbound slip roads to and from the A247 Clandon Road at Burnt Common. This will greatly increase traffic problems through both Send and Ripley as this will become a through route to Woking from the M25 and A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1481  Respondent: 15234017 / Martin Head  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I would like my comments to be seen by the inspector.

This plan has not been thought through, with potential major impacts on the villages of Send and Ripley.

The traffic is already bad particularly at rush hour times and also affected badly when the A3 is blocked around Guildford.

- I object to 2016 Draft local Plan
- I object to all erosion of the Green Belt
- I object to any “in-setting” of any villages from the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1482  Respondent: 15234017 / Martin Head  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

- I object to the disproportionate amount of development in one area of the Borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/308  Respondent: 15234017 / Martin Head  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
• I object to the limited consultation period

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/532  Respondent: 15234801 / John Sweeting  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

With regard to the sites numbered:

• A25 – Gosden Hill
• A43 and A43a - Land at Burnt Common – known as Garlick's Arch
• A35 – Former Wisley Airfield

in the revised draft local plan.

I would like to object to the inclusion of these sites in the draft local plan for the following reasons:

1. The number of houses needed in the Borough was changed between the first and second issues of the draft plan indicating that there is considerable uncertainty in this figure and the basis and method of calculation. In view of the recent EU referendum vote and its impact on future immigration, the number of houses required is likely to reduce further. With smaller house numbers the need for any loss of the Greenbelt should be reassessed as 'special circumstances' necessary for reclassification have not been established.

2. Sites 43 & 43a were introduced at the last minute and there has been insufficient time for consultation before its inclusion in the draft plan.

3. Wisley/Ripley/Send/Burnt Common/Send Marsh is a semi-rural area and development on this large scale will lead to urbanisation and permanently change the nature of the area. In particular this could provide the starting link in connecting Guildford to the M25.

4. These developments place a disproportionate burden on the north east of the Borough.

5. Traffic will increase significantly and the access and exit roads to and from the A3 are too narrow to cope with the resultant increase in traffic - particularly at peak hours.

6. Other infrastructure.
   Is there adequate power, drainage and sewage provision for industrial development and is there sufficient school, medical and similar provisions for domestic expansion?

7. Light and sound pollution.
   The area enjoys fairly dark skies for its proximity to London. Any additional development will add to the light pollution unless provisions are made to ensure strict control of any additional lighting. Please consult Guildford Astronomical Society. It already suffers from noise pollution from the A3. Traffic noise pollution seems inevitable if development proceeds.
   If included in the plan, provision should be made for strict control of noise and light pollution emanating from the site – particularly at nighttime.

8. The sites contain a substantial number of trees many of which are quite mature and must make a significant contribution to the Borough's carbon reduction target. It seems perverse that planning permissions have been
refused because of the impact on the individual trees whilst the wholesale destruction of woods seems inevitable if these sites are included.

It seems difficult to reconcile these two extreme positions. If included in the plan preservation orders should be placed on appropriate trees as a minimum requirement.

With respect to the site numbered A44 in the revised draft local plan.

I would like to object to the inclusion of this site in the draft local plan for the following reasons:

1. The number of houses needed in the Borough was changed between the first and second issues of the draft plan indicating that there is considerable uncertainty in this figure and the basis and method of calculation. In view of the recent EU referendum vote and its impact on future immigration, the number of houses required is likely to reduce further.

   With smaller house numbers the need for any loss of the Greenbelt should be reassessed as 'special circumstances' necessary for reclassification have not been established.

2. This site was introduced at the last minute and there has been insufficient time for consultation before its inclusion in the draft plan.

3. This development will add to the disproportionate burden on the north east of the Borough.

4. There is a question as to the suitability of the land for building purposes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/737  Respondent: 15234113 / Paul Wilkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Please note my objection to the draft local plan. I particularly object to the villages of Send, Ripley and Clandon being removed from the Green Belt and site A43 Garlicks Arch. This kind of development will have a negative impact of the surrounding area and affect the 'atmosphere' of the villages. Ripley is a particularly thriving community based around traditional village activities. Over population and ever increasing traffic will greatly affect this. Already there are limited school places and demand on other local facilities in this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/533  Respondent: 15234177 / Brianne Vally  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
I object to the lack of immediate provision for new schools. For instance, Surrey's primary school population has risen by more than 10,000 since 2010 and by 2,200 in 2015 alone.

I object due to the congestion that the proposed development will have on an already over loaded road network. I feel changes to existing trunk roads especially A3/M25 will have to be made prior to further development being considered/suggested. Moreover the rural roads around ripley, send and clandon are already overloaded with through traffic. These are narrow and in poor condition. Most don't currently have a footpath nor cycle path. There is no plan to improve these hence I object.

I object to the lack of any immediate provision for doctors surgeries. I feel the plan does not identify suitable infrastructure improvements in lieu of the sheer scale of proposed development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/534  Respondent: 15234177 / Brianne Vally  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

I object to the lack of evidence for the alleged housing need numbers. Housing need alone is not adequate grounds for building on the green belt.

I wish these comments and objections to be fully taken into consideration and look forward to seeing an amended version of the local plan shortly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1484  Respondent: 15234177 / Brianne Vally  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

I object to the lack of evidence for the alleged housing need numbers. Housing need alone is not adequate grounds for building on the green belt.
1. I object about all erosion of the green belt and any in-setting (ie removal) of any villages from the green belt. Has consideration been made to develop The existing brownfield site at burnt common ? (Policy P2)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1485  Respondent: 15234177 / Brianne Vally  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to development in areas which are at risk of flooding. I understand that the site at garlick's arch is classified by the EA as being at higher risk than the council's own assessment. The environment agency has previously stated that one in six homes in England is currently at risk of flooding with 2.4 million threatened by rivers and seas and a further 2.8 million at risk from surface water flooding so let's not add to these already worrying numbers. Under the Civil Contingencies act 2004 Guildford Borough Council has a duty to assess the risk of emergencies occurring and use this to inform contingency planning so why make the matter worth by building in a sensible area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1483  Respondent: 15234177 / Brianne Vally  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The local plan in its current form is for a number of reasons not fit for purpose and these are detailed below.

1. I object to the disproportionate amount of development in the borough especially Wisley Airfield and Garlick's arch. I believe a number of villages especially Ripley, Send and Clandon will be negatively impacted. (policy S1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/537  Respondent: 15234273 / Martin Jones  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

6. I object to the lack of any immediate provision for doctors surgeries. I feel the plan does not identify suitable infrastructure improvements in lieu of the sheer scale of proposed development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/536  Respondent: 15234273 / Martin Jones  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2. I object to the lack of evidence for the alleged housing need numbers. Housing need alone is not adequate grounds for building on the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1486  Respondent: 15234273 / Martin Jones  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have reviewed the plans proposed with regards to the revision of areas currently within the green belt and feel these plans are unacceptable due to the following:

1. I object due to the congestion that the proposed development will have on an already over loaded road network. I feel changes to existing trunk roads especially A3/M25 will have to be made prior to further development being considered/suggested. Moreover the rural roads around Ripley, send and Clandon are already overloaded with through traffic. These
are narrow and in poor condition. Most don't currently have a footpath nor cycle path. There is no plan to improve these hence I object.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1487  Respondent: 15234273 / Martin Jones  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3. I object about all erosion of the green belt and any in-setting (ie removal) of any villages from the green belt. Has consideration been made to develop The existing brownfield site at burnt common? (Policy P2).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1488  Respondent: 15234273 / Martin Jones  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4. I object to development in areas which are at risk of flooding. I understand that the site at Garlick's Arch is classified by the EA as being at higher risk than the council's own assessment. The environment agency has previously stated that one in six homes in England is currently at risk of flooding with 2.4 million threatened by rivers and seas and a further 2.8 million at risk from surface water flooding so let's not add to these already worrying numbers. Under the Civil Contingencies act 2004 Guildford Borough Council has a duty to assess the risk of emergencies occurring and use this to inform contingency planning so why make the matter worth by building in a sensible area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1489  Respondent: 15234273 / Martin Jones  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
1. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

1. I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows)- where the planning application has already been unanimously rejected by GBC's Planning Committee.

5. I object to the disproportionate amount of development in the borough especially Wisley Airfield and Garlick's arch. I believe a number of villages especially Ripley, Send and Clandon will be negatively impacted. (policy S1).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/540  Respondent: 15234529 / Oliver Pask  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/741  Respondent: 15234529 / Oliver Pask  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM)- Allocation A35-for the phased development of a new settlement of up to 2100 dwellings

I object to the draft local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBE).

5) I object to the threat the local Plan poses to the historic rural village of Ockham and the Blighton properties there. The plan calls for a Village of 159 residences (With narrow lanes, no street lights, very few pavements and many listed houses) to be subsumed into a 2,000 dwelling development, with urban-style buildings Up to five storeys high and a population density higher than most London boroughs.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
a. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development walking. The development is too isolated, and even within the development

b. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads

c. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements

d. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)

e. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RH S Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25! A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest

f. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heath Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously—air pollution in many parts of the borough, and particularly at the M25! A3 junction, is in excess of EU permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heath SPA and the irreversible impact of the habitat degradation.

9) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s greenspaces, including the FWA/TFM, protected.

10) I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a large number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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6) I object to the detrimental impact on transport, local roads and road I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
2. The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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8) I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM)

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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1. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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1. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/745</th>
<th>Respondent: 15234561 / Royal Surrey County Hospital (Alf Turner)</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction</td>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

The Royal Surrey County Hospital supports the developments listed under Policy Sites A16 and A17. This will improve the provision of low cost affordable housing for hospital and key worker staff. This will ensure the hospital is better able to attract and retain staff both now and in the future. The development of these areas is overdue.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: SQLP16/309  Respondent: 15234561 / Royal Surrey County Hospital (Alf Turner)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

The hospital supports the local plan and the various proposed developments on housing and transport infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/310  Respondent: 15234561 / Royal Surrey County Hospital (Alf Turner)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

Yes, it appears legally compliant

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/311  Respondent: 15234561 / Royal Surrey County Hospital (Alf Turner)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
The strategy is sound because the local area needs to develop housing and transport infrastructure to ensure ongoing growth and prosperity.

The provision of key worker housing is a major issue for the hospital as is transport access. Our staff have to travel significant distances to be able to work at the hospital so these are major retention issues.

The area around the University and the Research Park has inadequate transport and car parking infrastructure which causes patient, visitor and staff issues. This requires upgrading as it has not really changed for 15 years despite ongoing growth over this period.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

The strategy is sound because the local area needs to develop housing and transport infrastructure to ensure ongoing growth and prosperity.

The provision of key worker housing is a major issue for the hospital as is transport access. Our staff have to travel significant distances to be able to work at the hospital so these are major retention issues.

The area around the University and the Research Park has inadequate transport and car parking infrastructure which causes patient, visitor and staff issues. This requires upgrading as it has not really changed for 15 years despite ongoing growth over this period.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/312  Respondent: 15234561 / Royal Surrey County Hospital (Alf Turner)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

There has been extensive cooperation by the Council with the hospital in the development of the local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/1531  Respondent: 15234561 / Royal Surrey County Hospital (Alf Turner)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A16

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy (A16) – Land between Gill Avenue and Rosalind Franklin Close:

We believe that this site is currently allocated correctly as residential category C3 or potentially C4. In the opportunities section please can we have a new opportunity for potential key worker housing provision added.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1532  Respondent: 15234561 / Royal Surrey County Hospital (Alf Turner)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A17

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy (A17) – Land south of Royal Surrey County Hospital, Rosalind Franklin Close Guildford:

This site is currently allocated for hospital related development and is currently occupied by a temporary car park known as ‘plot 23’. We would like this site to be re-allocated as residential category C3/C4 as above. We would also like to have a new opportunity listed here for potential key worker housing provision.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/543  Respondent: 15234657 / Jenny Bole  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Draft Local Development Plan - Send, Send Marsh & Burnt Common

I am very concerned indeed about your proposal to increase the number of new homes in our villages from 185 to 485 by the sudden late (and, in my opinion, underhand and cynical move by Guildford Borough Council) inclusion of the large Green Belt Garlick's Arch area of fields and ancient woodland in this latest, and very flawed, Plan.

The last Plan put out two years ago allocated a total of 431 homes to our villages, which would have increased the population by nearly 25% - itself far too high for the local infrastructure - roads, schools, medical centre, etc - to cope with.

The revised Plan submitted to the Guildford Borough Council executive committee in April this year, lowering the figure to 185, was far more realistic, but even this would put great pressures on our infrastructure. At the Send Parish Council public
meeting at the Lancaster Hall on Tuesday 14th June, Councillors Spooner and Furniss, from GBC, promised that none of this massive development would take place before the infrastructure was in place to cope with it. But we all know how long it takes Governments and County Councils Highway Departments to plan for and actually build new roads, schools etc.

Political promises are much easier to make than keep! I OBJECT to the inclusion of the Garlick's Arch site in this Plan.

I wish this letter to be forwarded to the Government's Planning Inspector.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/545</th>
<th>Respondent: 15234849 / Alastair Fleming</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to the number of 693 houses proposed in the Local Plan for each year. The numbers calculated in accordance with the SHMA do not reflect true local need and have been inflated by the way students, economic need and affordability have been calculated.</td>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Ripley</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to the insetting of Ripley</td>
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<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Clandon</th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>I object to the insetting of West Clandon</td>
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<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to all sites in West Horsley for over 5 homes. The proposed sites will merge the villages of Ockham, West and East Horsley creating urban sprawl.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<th>Comment ID: PSLPS16/762  Respondent: 15234849 / Alastair Fleming  Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to the inclusion of the planned development of 2000 houses at Gosden Hill Farm, Merrow (Policy A25) in clear contravention of the Government's and Conservative councillors' election manifesto promises to protect the Green Belt. I object to the unsustainable nature of the site, the poor air quality and noise pollution levels that will result and the infrastructure deficit that will result.</td>
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<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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</table>
Comment ID: PSLPS16/761  Respondent: 15234849 / Alastair Fleming  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of Three Farm Meadows (Policy 35) due to the proposed removal of the site from the Green Belt when no exceptional, very special or special circumstances exist. In particular, I object to the unsustainable nature of the site, the poor air quality and noise pollution levels that will result, the infrastructure deficit that will result and the impact on views to and from the Surrey Hills.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/764  Respondent: 15234849 / Alastair Fleming  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the building of 45 houses at Clockbarn Nursery, Tannery Lane (Policy A42) on the grounds of inadequate access to and from the site. The roads surrounding the site are already hazardous, narrow and windy. Tannery Lane has already had planning permission granted for 64 houses and a marina and the location will not be able to cope with any more traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/759  Respondent: 15234849 / Alastair Fleming  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4. I object to the inclusion of land at Garlick’s Arch, Burnt Common and the proposed 400 houses and 7000 sq m of industrial warehousing on that site (Policy 43). Policy A43 and A43A were included at the last minute. They were not in the Regulation 18 draft and had not been consulted upon prior to the inclusion 2016 Local Plan.

5. I object to the impact of Policy A43 on ancient woodland on that site, on noise pollution and air pollution levels. The site is also prone to flooding.

6. I object to the impact of Policy A43 and A43A on local infrastructure. Congestion levels on A247 are already increasing at an alarming rate and will be further exacerbated by the development of Garlick’s Arch as the residents will have to rely on the use of private cars.

7. I object to the unsustainable nature of the site at Garlick’s Arch (Policy 43).

8. I object to the inclusion of policy A43 of 7000sq m of industrial warehousing as the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft. Slyfield Industrial Estate still has spare capacity and could accommodate any additional warehousing need if required.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/748  Respondent: 15234849 / Alastair Fleming  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In particular, I object on the following basis.

1. I object to the creation of a new 4 way interchange onto the A3 on the A247 (Policy A43A) as this would add to the ever increasing levels of traffic on the A247, A3 and through Send and Clandon. Send would become a through route to and from the A3 and will become gridlocked all day.

2. I object to the impact that Policy A43A will have on the air quality for those living in the surrounding areas and for future generations.

3. I object to the impact on residents that the resulting noise pollution of Policy A43A will have.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of land west of Wind Ridge and Send Hill designated for 40 homes and 2 Travellers' Pitches (Policy A44). The site was not included in the Regulation 18 draft and has not been consulted upon prior to the inclusion in the 2016 Local Plan.

12. I object to the impact of Policy A44 on an area of beautiful Green Belt countryside.

13. I object to the impact of Policy A44 as the subsoil of the existing site contains documented unsafe land fill waste which is currently vented.

14. I object to the impact of Policy A44, which includes 2 Travellers' Pitches, on the local infrastructure. The narrow width single track country road provides insufficient access for the pitches.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 15234849 / Alastair Fleming</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Following the approval of the revised Local Plan by the full council of Guildford Borough Council on 24th May, I would like to make it clear that I object to the provisions set out in the Local Plan as they threaten to destroy the established nature and identity of our villages by building on Green Belt land and will add considerably to the already unacceptable levels of traffic on the A3, A247 and M25 and many other roads in the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1568    Respondent: 15234849 / Alastair Fleming    Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the impact that additional residents will have on local roads, health services, education spaces and policing needs

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1556    Respondent: 15234849 / Alastair Fleming    Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

17. I object to the impact of further congestion on local village roads and lanes.

18. I object to the impact of excessive development on the A3 and M25 on air quality. The air quality in many parts of the borough is greater than EU permitted levels and will damage the health of residents and future residents.

19. I object to the fact that 70% of the proposed 13,860 houses are designated on Green Belt land along the A3. This will result in gridlock on the A3, the A247 and the surrounding roads which are already at capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1558    Respondent: 15234849 / Alastair Fleming    Agent:
20. I object to the inadequate protection of the environment.

21. I object to the fact that insufficient consideration has been given to the harm that will be caused to the Special Protection Area, the Sites of Special Scientific Interest and the borough's Conservation Area and heritage assets.

22. I object to the impact of poor air quality on the Special Protection Area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1561   Respondent: 15234849 / Alastair Fleming   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the erosion of the Green Belt in clear contravention of the Government's and Conservative councillor's election manifesto promises to protect the Green Belt. In particular, I object to Send being removed from the Green Belt (Policy P2) as Send provides a buffer between Woking and Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1569   Respondent: 15234849 / Alastair Fleming   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the failure of Guildford Borough Council to include the Town Centre Masterplan 2015 in the Local Plan and to find sufficient brownfield sites for development prior to considering sites within the Green Belt.

Please ensure that this letter, listing all of my objection, will be passed to the Planning Inspectorate for examination.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/1567  **Respondent:** 15234849 / Alastair Fleming  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the allocation of sites in unsustainable locations

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/749  **Respondent:** 15235265 / Michael Curlis  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A19

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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The obvious issues are that Park and ride were deemed a necessity hence this area turned into a car park bringing more dangers to area which has a growing and substantial school population no long term thinking going on there.

Now greed has kicked in and you are hoping to do away with this parking area, so where will these cars which use this site go.

You are considering building 38 homes so lets say each property has a min 2 car property 76 more cars in the area, of which about 38 actual spaces will be made for the 78 cars for these potential new residents.

Adding to parking issues in this area.

Currently school play areas are not sufficient why not turn some of this area into school field and use.

Oh yes that's right not enough money would be made out of this.
Now let's have a think about this while working class family are squeezed into a smaller and smaller living area with pot-holed roads. (Northway and side road along Aldershot road where frail OAP live, I'm sure you have not noticed only been like this for the last 5 years).

Students packed into ex-family homes ruining the mix of the area, devaluing house prices.

I have an idea, there is lots of lovely space around Albury, Chilworth Shalford, Merrow, Clandon, Shamley Green, Atrington, Puttenham.

Maybe some of these areas could absorb the flow of Migrants and the need for new builds to a growing population.

But no this will not happen why!

Oh yes you guys live there hey or your cohorts.

So hey ho another 38 homes whacked into an overcrowded area more pollution and fumes.

Cycles lanes for who? Not my Kids to dangerous.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Object to building 45 houses at Clockbarn Nursery because of inadequate access and traffic. The junction with Send Road is already very hazardous for vehicles trying to join the main road. Planning permission has already been granted for 64 apartments at the Tannery and for building the Marina both of which will generate additional extra traffic. The junction is already too dangerous.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/755  Respondent: 15236769 / Linda Aboel  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Send Village being removed from the Green Belt. The Green Belt was intended to be permanent, as required my the National Planning Policy Framework, and there are no special circumstances to justify abandoning it. Send's Green Belt provides an essential buffer stopping Woking and Guildford becoming one conurbation. Local Councillors and central government gave a clear election promise to protect the Green Belt and this reneges on it. Developers will be quick to take advantage and there will be nothing to stop them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/753  Respondent: 15236769 / Linda Aboel  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to 400 houses and 7000 sq metres of industrial space at Garlicks Arch opposite Send Marsh Road. The site floods and is covered by ancient woodland. The industrial space is not required but if it were it should be at Slyfield. Guildford housing requirements have been shown to be grossly exaggerated and you have refused to disclose your calculations. With proper use of brownfield sites the Green Belt is not needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/754  Respondent: 15236769 / Linda Aboel  Agent:
**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the development of 40 houses and 2 travellers pitches at Send Hill. It is an inapp location because the narrow single access country road provides insufficient access. The subsoil of the proposed site contains documented unsafe landfill waste registered at GBC. Any development there would spoil a high amenity area set in beautiful countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID: PSLPS16/751  Respondent: 15236801 / Carly Corrigall  Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed designation of the site at Blackwell Farm for the building of 1,800 houses, an industrial park, supermarket and travellers' pitches. This is likely to destroy views from the Hog's Back ridge, a designated Area of Outstanding Natural Beauty; remove 72 hectares of scenic farmland and ancient woodland from the green belt; increase tailbacks on the already very busy A31 and traffic congestion on this side of Guildford generally; result in rat-running through local residential roads causing both a nuisance and a danger to local residents as well as adding to pollution of the local area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID: SQLP16/336  Respondent: 15236833 / Uwe Frohmader  Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)
I do not agree with this plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/756  Respondent: 15237217 / Teresa Tilson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( Yes )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am concerned that there seems to be no mention of improvements to Glaziers Lane, Westwood Road or Normandy Crossroads.

There must be a supermarket. Wanborough station must be improved with ample car parking. Will the current doctors surgery cope with so many new patients?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/758  Respondent: 15237473 / Andrew Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This is a substantial development on green belt land. I see no evidence for the need to to make such a large development on green belt land and 'exceptional circumstances' have not been demonstrated to justify 1,100 houses to be built on the green belt. There is no need for a new secondary school as nearby schools are not currently full and there is no need for a school to serve local residents. It seems the council needs to build this many houses to justify the school rather than the school be required to serve the existing local community.

Has a local census been undertaken to demonstrate the need for a new secondary school? I see no empirical evidence for the need for a school to serve the existing local community in the plan.

This development will increase traffic and there is no evidence in this plan how to manage this extra traffic.
No assessment has been made at peak travelling hours when queues of traffic already appear at key junctions such as the junction of the A323 Guildford Road, Glaziers lane and Hunts Hill Rd and the junction of Westwood Lane and the A323 Guildford Road.

Doubling the size of the village will increase the traffic at these key junctions and before any plan is approved this issue needs to be addressed. Current roads are not designed to handle this extra traffic and Glaziers lane especially is not wide enough to cope with this extra traffic. I would like to see the traffic analysis which supports this huge increase in houses and subsequent traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/757  Respondent: 15237473 / Andrew Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A47

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The plan, ref A47, proposes 50 new dwellings next to the railway with no direct access to a main road. This will create a big increase in traffic through a quiet residential cul de sac street which is currently only designed to serve the 30 existing houses. Any proposed development of this size requires direct and simple access to main roads and is inappropriately placed within a residential area. The Paddocks is already a site of 30 houses and to increase it by a further 50 houses will disrupt access to the existing houses and this busy road will risk injury to the elderly people that live in the sheltered housing which opens on to the road. In short this plan proposes to turn a quiet, safe cul de sac into a dangerous access road.

This site is area of natural beauty with diverse wildlife next to the Christmas Pie way and this development will destroy the essential habitats of this wildlife.

This wildlife is preserved by waterways and casual water which floods the area every year. Building on this site will require substantial drainage, which will kill this water dependent wildlife, including the water voles. Has the appropriate research and assessment been carried out to ensure that the required drainage will not impact the existing wildlife? I would like to see evidence of the due process undertaken to measure this impact.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2507  Respondent: 15238049 / Glenda Charlick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
I object to the lack of any evidence for the alleged housing need numbers.
Please be the responsible Guardians of our future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5155  Respondent: 15238049 / Glenda Charlick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to site A25 Gosden Hill Farm - massive overdevelopment of 2000 homes in the green belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5156  Respondent: 15238049 / Glenda Charlick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to site A35 Wisley Airfield - 2000 homes that are totally inappropriate and unsustainable development in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
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<tr>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</th>
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<tr>
<td>I object to the late inclusion of site A45 Garlick Arch.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object to site A43a the on and off ramp at Burnt Common/Clandon - this will increase traffic problems in the villages, not help them</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object to site A45 The Talbot - this is overdevelopment in a conservation area. Wisley Airfield</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>This Green Belt was implemented for a reason, to protect from urban sprawl, to ensure Green spaces for generations to come not just for our generation. The Green Belt is not just for the people who live in the villages but for Londoners too for their health and their mental well being. There are plenty of other places to build that are more suitable, this seems to me to be a corrupt way for someone to make money at the expense and misery of everyone else not just for today but for the children and the wildlife of the future.</td>
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<td>I object to any &quot;in-setting (ie removal) of any villages from the Green Belt</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<tr>
<td>I object to the local plan as the development proposed is not sustainable (policy S1)</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
I object to the disproportionate amount of development in one area of the borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1721  Respondent: 15238049 / Glenda Charlick  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the local plan of building on Green Belt land. Site A43 Garlick's Arch increase of housing will be extremely harmful to the rural area of Ripley, Send and Clandon.

The inclusion of 6 x travelling show people plots with storage facilities is entirely inappropriate on Green Belt Land with the designated formula for 1500 to 1999 homes is out of scale.

The increase of industrial floor space to an unspecified amount does not provide enough information for a proper consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1722  Respondent: 15238049 / Glenda Charlick  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The proposed Waste Management facility at site A58 Burnt common does not allow for a proper consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/552  Respondent: 15238881 / Stephen John Tully  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to lack of immediate infrastructure: schools, doctors surgeries etc

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/550  Respondent: 15238881 / Stephen John Tully  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the complete lack of evidence for the alleged housing needs numbers

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/551  Respondent: 15238881 / Stephen John Tully  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to disproportionate amount of development in one area of the Borough namely Send, Ripley and Burnt Common areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/553  Respondent: 15238881 / Stephen John Tully  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the complete lack of evidence for the alleged housing needs numbers

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the building on the Green Belt at Send; Garlick's Arch and Send Hill because it is not justified by any exceptional circumstances, the Green Belt is meant to be permanent and not continually eroded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/554  Respondent: 15238881 / Stephen John Tully  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of Send from the Green Belt because the village and the surrounding countryside provide the necessary buffer between Woking and Guildford.

I will be writing again when I have had more time to consider the plan; the consultation time is inadequate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/766  Respondent: 15238881 / Stephen John Tully  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to site A43a on and off ramp at Clandon, this will increase traffic problems.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/767   Respondent: 15238881 / Stephen John Tully   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object to the development of 40 houses at Send Hill, this is high quality amenity land within the Green Belt and is an area of beautiful countryside which could be spoilt. This site is a former landfill site and is known to contain hazardous waste.

I object to the proposal to include 2 traveller's pitches in the Send Hill site as this completely inappropriate considering access which is very restricted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2777   Respondent: 15238881 / Stephen John Tully   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object to any development at Send Hill proposals to develop this site have blighted the Send Hill community for nearly a decade. Proposals for gypsy site / affordable housing was first tabled – 2007. The objections from Send residents ran into many hundreds. These responses must still be on record, are they just ignored?

I object the proposed development in Send Hill on health grounds. The site is a former land fill site, insufficient records are available to indicate what is buried there; the environment agency website indicates all types waste was disposed of including hazardous. My environmental surveyor indicated that there old landfill site were not dangerous if left alone and undisturbed.

I object to the proposed development in Send Hill as it would destroy a beautiful tranquil amenity used by many villages. This field is regularly used by the local community for recreational use such as dog walking jogging rambling cricket and picnics. It is surrounded by public footpaths and has many mature trees and bushes upon it. It is a quiet area and forms a perfect haven for wildlife and birds including deer, bats, rabbits, squirrels, moles, hedgehogs, jays, woodpeckers to name a few. There is a large pond nearby containing frogs newts and wild fowl. Some of these species are protected. It is only...
I object to the proposal at Send Hill because Send Hill is a single track country road; it is too narrow to accommodate the potential new levels of traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I wrote to you on the 1/7/2016 detailing my objections to the local plan in general terms. I am writing again with more specific objections.

I object to any “in setting” (i.e. removal) of any villages from the Green Belt. Guildford Borough Council took the DCLA to judicial review in 2009 and the court quashed policies that would have forced GBC to find Green Belt land for homes. With the government abolition of regional spatial strategies the requirement to seek Green Belt sites has gone. At the time Andrew Povey (S.C.C leader) said providing more homes should not happen if it means cementing our vast area of countryside. Sir Paul Beresford and GBC conservative councillors stood on a policy of no development in the green Belt unless in exceptional circumstances – There are no exceptional circumstances. The whole issue of in setting is undemocratic. Local people have raised concerns for the last decade concerning over development of our villages. I know Sir Paul Beresford is on record as saying that local people must have a real say in housing numbers he is also omitted to protecting our natural environment and wildlife from over-exploitation of resources and development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/340  Respondent: 15238881 / Stephen John Tully  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to GBC failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
3. I object to the last minute inclusion of new sites with less than 2 weeks notice.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/1173  **Respondent:** 15239169 / First Regional Estates Ltd (Daniel Goldberg)  **Agent:** GL Hearn Limited (Paul Woods)

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A10

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

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Our client, First Regional Estates Ltd, is the owner of the Jewsons builders’ merchant site, Walnut Tree Close in Guildford town centre. A strip of land within the western and northern boundaries of our client’s site forms part of the site allocation for a ‘Sustainable Movement Corridor: Town Centre Phase 2’ under Policy A10. As set out in the Council’s Progress Update on Sustainable Movement Corridor Scheme (June 2016), we understand that the branch of the corridor along the western side of our client’s site is to be used by pedestrians and cyclists to access Guildford railway station and onwards to the town centre, as an alternative to the sustainable movement route on the southern section of Walnut Trees Close.

We object to this site allocation on the basis that the timing for this initiative is uncertain and the allocation would potentially prevent the full and effective use of our client’s site for alternative development. The sustainable movement corridor scheme is included within the Council’s Infrastructure Schedule at Appendix C of the Submission Draft Local Plan. This notes that the scheme is to be delivered by a combination of Surrey County Council, Guildford Borough Council, Network Rail and developers(s) and that the delivery timeframe is set between 2018 and 2033. It is further noted that the scheme is likely to cost in the region of £5 -10m and the likely funding source will be developer contributions and the Local Growth Fund. We further understand that the works are subject to the replacement of Yorkie’s bridge across the railway, which in itself is estimated to be delivered in the same timeframe by the same partners and through the same funding source. The Guildford Borough Transport Strategy (2016) confirms that both these schemes do not fall within the ‘Committed’ category as defined within the Strategy; rather they fall within the ‘Anticipated’ category and are subject to a positive business case being prepared.

In the absence of certainty at this stage on the deliverability of these schemes, we consider that the area of our client’s site the subject of Policy A10 should be incorporated into the Policy A5 allocation within the Submission Draft Local Plan and the A10 allocation deleted accordingly. As part of the redevelopment of our client’s site under Policy A5, there should be an opportunity to provide for a shared pedestrian/cycle link through the site linking Station View with Walnut Tree Close and the alignment of this could be appropriately designed as part of a comprehensive redevelopment of the entire site.

Having regard to the above, we consider that Policy A10 is unsound on the basis that it is not justified and does not represent the most appropriate strategy for the development of the area when considered against the alternative of a comprehensive redevelopment which has the potential to incorporate a pedestrian/cycle link.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Our client, First Regional Estates Ltd, is the owner of the Jewsons builders’ merchant site, Walnut Tree Close in Guildford town centre, part of which is the subject of a proposed residential allocation for approximately 125 homes under Policy A5.

The Jewsons site is a regular shaped site in a highly accessible location being situated on the edge of the town centre, a short distance from Guildford railway station. The site was first identified in the Council’s Strategic Housing Land Availability Assessment (2014) under site ref: 1107 as suitable for residential development, although it was also noted that there was a possibility of redeveloping to provide a mixed use to include new homes and employment. The site was subsequently identified as a site allocation in the Council’s draft Local Plan Strategy and Sites Consultation (Regulation 18) which took place over a 12 week period from 1 July 2014. Identified as site 29, the allocation referred to ‘Housing (C3) and/or office (B1a)’. The commentary indicated that the site is situated in a sustainable location close to the station and that there was potential to incorporate commercial office use as part of a residential led mixed use scheme.

For the reasons set out below, we consider that there should be flexibility on the potential uses of the site to include in addition to residential use, the potential for student accommodation and the potential for an element of commercial space including office, retail/restaurant or leisure use as part of a mixed use scheme. We also consider that the indicative housing number of 125 homes underestimates the development potential of the site.

As set out in our comments on Policy A10, in the absence of certainty on the deliverability of the sustainable movement corridor scheme the subject of A10, we also consider that the Policy A5 site allocation should be extended to include the strips of land in our client’s ownership to the west and north currently the subject of the site allocation under Policy A10. This would provide for an enlarged site area of 0.73 hectares to accord with the site allocation 29 within the Council’s previous Draft Local Plan Regulation 18 consultation.

Potential Uses

We welcome the Council’s acknowledgment that the site is suitable for residential development. However, in light of the site’s central and sustainable location close to Guildford town centre, Guildford University and the railway station, we consider that the site would lend itself to a range of potential uses and we would ask that this is reflected in the policy with reference in particular to the site having flexibility to provide residential or student accommodation with the potential for an element of commercial floorspace including office, retail/restaurant or leisure uses.

With respect to potential commercial uses, the potential of the site for commercial offices was previously recognised by the Council at least in part and commercial offices are being developed as part of a mixed use scheme to the south of the site at 1 & 2 Station View. Central government policy set out in the National Planning Policy Framework (NPPF) (2012) indicates at paragraph 23 that local planning authorities should, inter alia, allocate a range of suitable sites to meet the scale and type of retail, commercial, office, tourism, cultural, community and residential development needed in town centres and that it is important that needs for retail, leisure, office and other main town centre uses are met in full and are not compromised by limited site availability. Demand for such space will play a factor, however our client wishes to retain the flexibility at this stage.

With respect to student housing, we consider that the site represents an ideal location for such development having regard to its location. Not only is it located close to the town centre and railway station, but also the main University of Surrey...
Stag Hill Campus is situated a short distance away from the site on the other side of the railway line accessed via Yorkie’s bridge.

Policy H1 (Homes for All) of the Council’s Submission Draft Local Plan indicates that new residential development is required to deliver a wide choice of homes and meet a range of housing needs as set out in the Council’s latest Strategic Housing Market Assessment (SHMA). With respect to students, the draft policy notes that the Council will expect 60% of the University of Surrey eligible student population (full time equivalent) to be provided with student bed spaces and accommodation on campus.

Consideration of student housing need is contained at Appendix C of the West Surrey SHMA (September 2015). This sets out predicted growth in student numbers over the plan period and notes that currently University accommodation only meets the needs of 52% of eligible students. With the expected increase in student numbers as noted in the SHMA, there will be increased pressure on the University to provide student accommodation and off site provision conveniently located for the University Campus would assist in meeting this need and in turn would release pressure on the general housing market, particularly the less expensive rented sector.

The site has the flexibility to meet the demand for the above range of uses. We would ask that this flexibility is reflected in the site allocation rather than the site being restricted to a single use.

Density of Development

We consider that the allocated provision of approximately 125 residential units underestimates the development potential of this edge of town centre site, particularly having regard to its proximity to the railway station.

Policy H1 of the Submission Draft Local Plan indicates that new residential development is required to make the most efficient use of land whilst responding to local character, context and distinctiveness. The policy describes how residential densities will vary dependent upon the local area context and character and sustainability of the location. It is noted that higher density development will be supported in Guildford town centre. Supporting paragraph 4.2.8 indicates that there is a responsibility to use natural resources, such as land, wisely and that efficient use of land is essential. The paragraph describes how increasing densities can help reduce the land needed for new homes and make development more sustainable and can also help support facilities and services. This is particularly important for a town like Guildford which is surrounded by Green Belt and where there is invariably development pressure on green field sites.

Paragraph 17 of the NPPF sets out 12 core planning principles which it indicates should underpin both plan-making and decision-taking. These include encouraging the effective use of land by reusing land that has previously been developed; promoting mixed use developments; and actively managing patterns of growth to make the fullest possible use of public transport, walking and cycling and focusing significant development in locations which are or can be made sustainable.

The Government consulted on proposed changes to national planning policy in the NPPF over the period 7 December 2015 to 22 February 2016. One of the topics the subject of consultation was increasing residential density around commuter hubs. Paragraph 14 of the consultation document indicates that there are significant benefits to encouraging development around new and existing commuter hubs, thereby reducing travel distances by private transport, making effective use of private and public sector land in sustainable locations, and helping to secure the wider regeneration and growth of the local area. It is noted in the paragraph that in this context the Government is keen to support higher density housing development around commuter hubs to help meet a range of housing needs. Paragraph 15 indicates that the Government is proposing to change national planning policy to require higher density development around commuter hubs wherever feasible. The Government is proposing that a commuter hub is defined, inter alia, as a public transport interchange (rail, tube or tram) where people can board or alight to continue their journey by other public transport (including buses), walking or cycling. Whilst this policy approach has yet to be incorporated into national policy, it is a clear statement of intent on the part of Government to increase residential densities around commuter hubs.

Having regard to the above, Policy A5 should be looking to maximise the potential of the site having regard to its sustainable location. It is clear that Guildford Station falls within the definition of a commuter hub as noted above and the
The indicative housing number for the site of 125 homes based on a plot of 0.64 equates to a residential density of 195 dwellings per hectare. We consider this underestimates the development potential of the site.

In particular, we refer to the residential led mixed use scheme (incorporating offices) immediately south of the site at 1 & 2 Station View, which is the final stages of construction under outline planning permission ref: 06/P/02309 and reserved matters approval ref: 09/P/01965 with subsequent minor alterations under variation of conditions permission ref: 14/P/01614. This development provides for 177 dwellings on a site of 0.5 hectares equating to a residential density of 354 dwellings per hectare. Furthermore, the scheme at 1 & 2 Station View provides for 1,837 sqm of B1 office floor space in addition to the residential floor space.

The Council’s planning committee report in relation to the outline planning permission ref: 06/P/02309 for the scheme at 1 & 2 Station View in consideration of density indicated that the site is highly sustainable and therefore it was appropriate to seek a high density, although it was noted that a balance needs to be made between making best use of limited urban land and ensuring that any development integrates with the surroundings through a design lead approach.

The Jewsons site and the site at 1 & 2 Station View sit within a similar urban context. If one was to apply the same density to the draft site allocation under Policy A5 as that accepted by the Council at 1 & 2 Station View, based on a site area of 0.64 hectares a potential redevelopment scheme could give rise to 226 residential units with potential for some additional commercial space as part of a mixed use scheme. Based on a larger site allocation of 0.73 hectares incorporating the strips of land to the west and north of our client’s site, a potential redevelopment scheme could give rise to 258 units plus some commercial uses. We would recommend that the proposed density for the Policy A5 site is more aligned to the density of development at 1 & 2 Station View acknowledging that it is a guide to development and actual form and scale of development will be determined through a design led approach.

Having regard to the above, we consider that the current wording of the policy is unsound on the basis that it is inconsistent with national planning policy. Also, the extent of the allocation and current drafting of the policy is not justified when considered against reasonable alternatives and is not effective in making the best use of the site at an appropriate density. It is also not flexible enough to allow for a suitable range of town centre uses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Paragraph 22 of the National Planning Policy Framework (NPPF) indicates that planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. The NPPF notes that where there is no reasonable prospect, applications for alternative uses of land and buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.

On 13 October 2015, the Government announced that the temporary permitted development rights allowing change of use from offices to residential would be made permanent and these rights have since been confirmed through amendments to the General Permitted Development Order. The Housing and Planning Minister, Brandon Lewis, said at the time of the announcement: “We’re determined that, both in Whitehall and in town halls, everything is done to get the homes we need built. Today’s measures will mean we can tap into the potential of underused buildings to offer new homes for first-time buyers and families long into the future, breathing new life into our neighbourhoods and at the same protecting our precious green belt”.

Such an approach is particularly pertinent to an area such as Guildford which is surrounded by green belt and which currently only has a 2.4 year supply of specific deliverable housing sites based on the Council’s latest Annual Monitoring Report for 2014/2015 published in October 2015.

Having regard to the above, we consider that the policy as currently drafted is unsound on the basis that it is not justified. It does not provide the most appropriate strategy having regard to the clear need to deliver new housing within the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2682  Respondent: 15239169 / First Regional Estates Ltd (Daniel Goldberg)  Agent: GL Hearn Limited (Paul Woods)

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A10

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We submitted comments to the proposed submission draft version of the Local Plan on 18 July 2016 in respect of Policy A10 (Comment ID PSLPS16/1151) on behalf of our client First Regional Estates Limited, which is the owner of the Jewsons builders merchants site. We objected to the policy and recommended that it be deleted. Whilst part of the site allocation has been incorporated into the allocation under Policy A5, for the reasons set out in our original representations, we maintain our objection that the policy should be deleted. Notwithstanding, we note that further changes have been made to the policy wording to which our client strongly objects.

Under Requirements paragraph (1), reference to Appendix C Infrastructure Schedule has been deleted and in its place reference has now been made to ‘...having regard to the Sustainable Movement Corridor Supplementary Planning Document’ (SPD). We understand from the Council's Planning Policy team that this SPD has yet to be produced even in draft and will not be produced until after work on the preparation of the Local Plan is complete. We consider that the draft Plan is unsound in making reference to, and placing justification on, a SPD that does not currently exist.
Under paragraph (2), the wording has been amended to indicate that access to the Jewsons site will only be maintained for pedestrians. Our client strongly objects to this change on the basis that restricting vehicular access will severely prejudice both the existing operation and future development potential of the site.

With respect to the existing operation, there is no indication that the policy will be implemented in tandem with the redevelopment of the Jewsons site under Policy A5. The Policy as currently worded is ill conceived and should be deleted. The operation of the Jewsons Builders Merchant site is reliant on its main vehicular access from Walnut Tree Close which is used by all customers and visitors and through which trade is undertaken. Taking away these access rights will prejudice this local employer. Secondary access is provided to the site from Station View, however Station View is not adopted highway and access is through the station car park and mixed use development to the south and is not suitable as the main access to the site.

Restricting vehicular access from Walnut Tree Close as part of any redevelopment of the Jewsons site would also serve to restrict the options and flexibility for redevelopment of the site and so undermine its redevelopment potential. In our view, it is difficult to see how vehicular access to serve a single development site in this location (which would have the benefit of additional access from Station View) would give rise to traffic generation levels which would undermine the Council's aspirations for a sustainable movement corridor in this location.

For the above reasons we consider that the policy is unsound.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

For the reasons set out in our original representations, we consider that the policy should be deleted. Notwithstanding, access to the Jewsons site from Walnut Tree Close should be maintained for vehicles and pedestrians and reference to the Sustainable Movement Corridor SPD should be deleted.

Attached documents:

Comment ID: pslp172/2683  Respondent: 15239169 / First Regional Estates Ltd (Daniel Goldberg)  Agent: GL Hearn Limited (Paul Woods)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We submitted comments to the proposed submission draft version of the Local Plan on 18 July 2016 in respect of Policy A5 (Comment ID PSLPS16/1150) on behalf of our client, First Regional Estates Ltd, which is the owner of the Jewsons builders merchant site. Our comment on the opportunity to incorporate the provision of a shared pedestrian/cycle route through the site has been partly addressed, however the Council has sought to keep Policy A10 in respect of the strip of land to the north of our client's site to which we maintain our objection (see our response to further amendments to Policy A10).

We maintain our objections to the other elements of Policy A5 as set out in our original representations. We also now object to the following further amendments.

Under Requirements paragraph (2), reference is made to ‘...having regard to the Sustainable Movement Corridor Supplementary Planning Document' (SPD). We understand from the Council's Planning Policy team that this SPD has yet
to be produced even in draft and will not be produced until after work on the preparation of the Local Plan is complete. We consider that the draft Local Plan is unsound in making reference to, and placing justification on, a SPD that does not currently exist.

Paragraph (3) introduces a new requirement that vehicular access to the site will be from Station View. Our client strongly objects to this new requirement on the basis that restricting vehicular access from Walnut Tree Close as part of any redevelopment of the Jewsons site would serve to restrict the options and flexibility for redevelopment and so undermine the site's redevelopment potential. Access from Station View is secondary access to the site and Station View is not adopted highway. In our view, it is difficult to see how vehicular access from Walnut tree Close to serve a single development site in this location (which would have the benefit of additional access from Station View) would give rise to traffic generation levels which would undermine the Council's aspirations for a sustainable movement corridor in this location. On this basis, we consider that the restriction on vehicular access is unnecessary and is unsound.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

We maintain our original objections to the submission draft Local Plan. With respect to the proposed further amendments, we recommend deletion of '...having regard to the Sustainable Movement Corridor Supplementary Planning Document' under paragraph (2) and deletion of paragraph (3).

Attached documents:

Comment ID: PSLPA16/559  Respondent: 15239297 / T Fleming  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the number of 693 new houses proposed in the Local Plan for each year. The numbers calculated in accordance with the SHMA do not reflect true local need and have been inflated by the way students, economic need and affordability have been calculated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/562  Respondent: 15239297 / T Fleming  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Clandon

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the insetting of West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to all sites in West Horsley for over 5 homes. The proposed sites will merge the villages of Ockham, West and East Horsley creating urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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10. I object to the inclusion of the planned development of 2000 houses at Gosden Hill Farm, Merrow (Policy A25) in clear contravention of the Government's and Conservative councillors' election manifesto promises to protect the Green Belt. I object to the unsustainable nature of the site, the poor air quality and noise pollution levels that will result and the infrastructure deficit that will result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<td>I object to proposed development of 1,800 houses at Blackwell Farm</td>
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<td>I object to the inclusion of Three Farm Meadows (Policy 35) due to the proposed removal of the site from the Green Belt when no exceptional, very special or special circumstances exist. In particular, I object to the unsustainable nature of the site, the poor air quality and noise pollution levels that will result, the infrastructure deficit that will result and the impact on views to and from the Surrey Hills.</td>
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<td>15. I object to the building of 45 houses at Clockbarn Nursery, Tannery Lane (Policy A42) on the grounds of inadequate access to and from the site. The roads surrounding the site are already hazardous, narrow and windy. Tannery Lane has already had planning permission granted for 64 houses and a marina and the location will not be able to cope with any more traffic.</td>
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4. I object to the inclusion of land at Garlick’s Arch, Burnt Common and the proposed 400 houses and 7000 sq m of industrial warehousing on that site (Policy 43). Policy A43 and A43A were included at the last minute. They were not in the Regulation 18 draft and had not been consulted upon prior to the inclusion 2016 Local Plan.

5. I object to the impact of Policy A43 on ancient woodland on that site, on noise pollution and air pollution levels. The site is also prone to flooding.

6. I object to the impact of Policy A43 and A43A on local infrastructure. Congestion levels on A247 are already increasing at an alarming rate and will be further exacerbated by the development of Garlick’s Arch as the residents will have to rely on the use of private cars.

7. I object to the unsustainable nature of the site at Garlick’s Arch (Policy 43).

8. I object to the inclusion of policy A43 of 7000sq m of industrial warehousing as the latest £ Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft. Slyfield Industrial Estate still has spare capacity and could accommodate any additional warehousing need if required.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
In particular, I object on the following basis.

1. I object to the creation of a new 4 way interchange onto the A3 on the A247 (Policy A43A) as this would add to the ever increasing levels of traffic on the A247, A3 and through Send and Clandon. Send would become a through route to and from the A3 and will become gridlocked all day.

2. I object to the impact that Policy A43A will have on the air quality for those living in the surrounding areas and for future generations.

3. I object to the impact on residents that the resulting noise pollution of Policy A43A will have.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/774  Respondent: 15239297 / T Fleming  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

11. I object to the inclusion of land west of Wind Ridge and Send Hill designated for 40 homes and 2 Travellers' Pitches (Policy A44). The site was not included in the Regulation 18 draft and has not been consulted upon prior to the inclusion in the 2016 Local Plan.

12. I object to the impact of Policy A44 on an area of beautiful Green Belt countryside.

13. I object to the impact of Policy A44 as the subsoil of the existing site contains documented unsafe land fill waste which is currently vented.

14. I object to the impact of Policy A44, which includes 2 Travellers' Pitches, on the local infrastructure. The narrow width single track country road provides insufficient access for the pitches.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1577  Respondent: 15239297 / T Fleming  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Objections to the 2016 local Plan

Following the approval of the revised Local Plan by the full council of Guildford Borough Council on 24th May, I would like to make it clear that I object to the provisions set out in the Local Plan as they threaten to destroy the established nature and identity of our villages by building on Green Belt land and will add considerably to the already unacceptable levels of traffic on the A3, A247 and M25 and many other roads in the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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17. I object to the impact of further congestion on local village roads and lanes.

18. I object to the impact of excessive development on the A3 and M25 on air quality. The air quality in many parts of the borough is greater than EU permitted levels and will damage the health of residents and future residents.

19. I object to the fact that 70% of the proposed 13,860 houses are designated on Green Belt land along the A3. This will result in gridlock on the A3, the A247 and the surrounding roads which are already at capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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20. I object to the inadequate protection of the environment.

21. I object to the fact that insufficient consideration has been given to the harm that will be caused to the Special Protection Area, the Sites of Special Scientific Interest and the borough's Conservation Area and heritage assets.

22. I object to the impact of poor air quality on the Special Protection Area.

23. I object to the erosion of the Green Belt in clear contravention of the Government's and Conservative councillors' election manifesto promises to protect the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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29. I object to the impact that additional residents will have on local roads, health services, education spaces and policing needs.

30. I object to the failure of Guildford Borough Council to include the Town Centre Masterplan 2015 in the Local Plan and to find sufficient brownfield sites for development prior to considering sites within the Green Belt.

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Comment ID: PSLPP16/1594  Respondent: 15239297 / T Fleming  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In particular, I object to Send being removed from the Green Belt (Policy P2) as Send provides a buffer between Woking and Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/1595  Respondent: 15239297 / T Fleming  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

28. I object to the allocation of sites in unsustainable locations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPA16/557  Respondent: 15239425 / Debbie Preece  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of immediate provision for new schools.
I object to the lack of any immediate provision for Doctors Surgeries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPA16/556  Respondent: 15239425 / Debbie Preece  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of any evidence for the alleged housing need numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1578  Respondent: 15239425 / Debbie Preece  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to all erosion of the Green Belt.
I object to any “in-setting” (ie removal) of any villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1579  Respondent: 15239425 / Debbie Preece  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the disproportionate amount of development in one area of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/342  Respondent: 15239425 / Debbie Preece  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the limited consultation period.

I object to the last minute inclusion of new sites with less than 2 weeks notice.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/569  Respondent: 15240161 / R O Moore  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

10. The proposed Infrastructure Schedule (Appendix C)

The Schedule sets out the key infrastructure requirements the Plan depends on. There is no schedule for Garlick’s Arch (A43), so the Plan takes no account of the infrastructure required for this site. It is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/568  Respondent: 15240161 / R O Moore  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
9. The Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough. This is more than double the figure of 322 used in previous plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/790   Respondent: 15240161 / R O Moore   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

6. The inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch, which has ancient woodland, is protected from development as Green Belt. There are no exceptional circumstances which allow for it’s removal from the Green Belt (Policy P2). Central Government state clearly that housing need is not an exceptional circumstance. The Plan states the preference is for the use of previously developed land. GBC have removed a brownfield site at Burnt Common replaced it with Garlick’s Arch.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/791   Respondent: 15240161 / R O Moore   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

12. The employment strategy and impact at Garlick’s Arch (A43) (Policies E2 and E5)

There is no need for new industrial sites at Garlick’s Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000 sq m proposed. That site was removed from the Plan without any reasoning.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<tr>
<td>5. The inclusion of the land for new on/off ramps at Burnt Common (A43a)</td>
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<td>The addition of North facing ramps to the A3 at Burnt Common would draw in a huge amount of ‘through’ traffic. E.g. all traffic from London/M25 to Woking would go through Burnt Common, and the bottle necks of Send and Old Woking.</td>
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<tr>
<td>8. The damage to the historic environment as a result of the scale of the proposed development (Policy D3)</td>
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<td>The Garlick’s Arch (A43) proposal would double the built area in the locality, and would irrevocably damage the character of the Ancient Woodland on the site, which includes ancient oak trees.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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</table>
3. Road congestion that development will cause to the local village roads because of lack of road infrastructure (Policy I1)

There is too much traffic in the villages already and this plan will cause more congestion in Ripley, Send and Clandon. The rural roads in this area are narrow, in poor condition (eg Polesden Lane) and have no footpaths. 5000 more houses means unsustainable traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1622  Respondent: 15240161 / R O Moore  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

13. The lack of proper infrastructure planning for sites (Policy I1)

There are no adequate infrastructure improvements to support the huge scale of development, especially at Garlick’s Arch (A43). There are no plans to improve the capability of the medical, emergency and other services to cover the proposed developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1623  Respondent: 15240161 / R O Moore  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

14. The congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

According to Highways England, no real improvements to the A3 or M25 are possible in the timeframe of this Plan so the developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), should not take place.

I wish the above objections to be fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
11. Poor air quality concerns (Policy I3)

The huge developments, particularly in the north east of the borough will lead to further congestion and greater levels of air pollution, which will have a detrimental effect on the health of local residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1618  Respondent: 15240161 / R O Moore  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

2. Removal of Green Belt (Policy P2)

Ripley, Send, Clandon and sites at Wisley Airfield (A35) and Garlick’s Arch (A43). must not be removed from the Green Belt, I object to the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

### 4. Development in areas which are at risk of flooding (Policy P4)

The Plan does not take adequate account of flood risk as required by National Planning Policy. The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Objections to Guildford Borough Proposed Submission Local Plan (June 2016)**

I lived in Kiln Lane, Ripley for over 22 years and object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2016) on the following grounds.

1. **The development proposed is not sustainable (Policy S1)**

13,860 new houses will damage local communities by over development, especially Ripley, Send and Clandon. We don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services and resultant car usage will be high. The Plan has nothing to improve the infrastructure for the Garlick's Arch area. The Plan takes no account of the effects of the recent referendum which rejected UK membership of the EU any may reduce the demand for new housing in the future.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<tr>
<th>Comment ID:</th>
<th>PSLPP16/1619</th>
<th><strong>Respondent:</strong></th>
<th>15240161 / R O Moore</th>
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<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ( )</strong></td>
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</table>
7. The Borough Wide Strategy (Policy S2)

The Plan is unbalanced across the borough; there is too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing.

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will lead to a loss of village identities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/1633</th>
<th>Respondent: 15240673 / Chris Cook</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ) , is Sound? ( ) , is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

- There is no provision for improved road traffic access/facilities. The road conditions in East Lane reflect those of an undeveloped country!

- There is no viable provision for additional infrastructure to accommodate the proposal; no references are made to mitigate for increased needs for improved public transport (bus and rail/rail parking), medical and educational needs (Primary & Secondary).

- The increase in demand on existing shopping and parking facilities would prove highly detrimental to all those using them.

- Waste water and sewage requirements are not adequately provisioned for and the inclusion of proposed builds in FRZ 2/3 are not suitably mitigated.

Please do not proceed with this ill conceived plan!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/1631</th>
<th>Respondent: 15240673 / Chris Cook</th>
<th>Agent:</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
I am writing to object, in the strongest terms, to the above mentioned plan for the following reasons:

- Policies P1 & P2 are clearly at odds with your policy of protecting the Metro Greenbelt and AONB from inappropriate development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1632  Respondent: 15240673 / Chris Cook  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- Policy S2 proposes a ridiculous volume of new higher density homes (385) which will completely change the character of the village to its' detriment. A very small volume of affordable homes should be considered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/800  Respondent: 15240929 / P. A. Finch  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the developments as Garlicks Arch is protected as it is in a Green Belt area and there are no exceptional circumstances to remove it from the Green Belt as housing need is not an exceptional circumstance as stated by Central Government.

The plan states that it would be preferable to use previously developed land but Guildford Borough Council have removed a brownfield site at Burnt Common without reason.

I object to the proposed new industrial sites at Garlicks Arch as this will result in a loss of employment for local people in the four existing rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
2 I object to the proposed on/off ramp at Burnt Common. This will increase the amount of traffic going through Ripley, Send and Old Woking and should there be any closure on the A3 the traffic will be diverted through these villages, as it has been in the past, and the roads will be gridlocked.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1645  Respondent: 15240929 / P. A. Finch  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

6 I object to the Borough wide strategy for over 13,000 new houses without any constraints. This differs to all the other borough councils in Surrey and is over twice the figures for previous years. There is already too much new development in Wisley, Ripley and Clandon. If the proposed development goes ahead then these villages would lose their individual identities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
5 I object that there are no plans to improve schools, medical services or the utilities which are almost at full capacity now. The local shops would not cope with the population increase as there is already serious congestion around local shops especially in Ripley and parking is a real problem with people parking in restricted areas just to be able to use the local amenities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1643  Respondent: 15240929 / P. A. Finch  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have lived in the Ripley area for 46 years and therefore list below all my objections to the proposed developments at Garlicks Arch, Wisley and Gosden Hill.

1 I object to the congestion this will cause. There are no railway stations in Ripley and Wisley and no reliable bus service. This will result in an increase of road traffic as everyone will be using cars. The local roads are narrow and in bad repair.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1646  Respondent: 15240929 / P. A. Finch  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

7 I object to the damage that would be caused by the proposed plan to the wildlife and the ancient woodland with the old oak trees.

8 I object to development in areas which are at risk of flooding. The area at Garlicks Arch has flooded many times in the past and is therefore at greater risk.

9 I object to not protecting the green belt.

10 I object to the villages of Ripley, Send and Clandon being removed from the green belt as there are no exceptional circumstances to remove these villages from the green belt.
I wish my objections to be taken into consideration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/807</th>
<th>Respondent: 15241153 / Patricia Short</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

This proposed development of area covered by A46 (Normandy and Flexford) is totally wrong for a "Greenbelt" designated site(s).

Suddenly, this so-called protected area can be released to suit-- I would suggest that few, if any, planning committee members live here or in the region, if they even know where it is, or they would be totally aware of the problems that already exist in this village, like basic infrastructure, and the already increase in the volume of traffic "rat run" and all that that entails. Many suffer with unreliable drainage, and the 2 bridges in Westwood Lane and Glaziers Lane have their own problems. We certainly do not need another school in this area, and I know the reasons why not, have been covered by those with far more knowledge of this than myself.

Over the 50+ years that we have lived here, there has been much infilling between properties, which has happened gradually, and any extra strain on local amenities has been slowly absorbed, but to put in developments en masse such as suggested by A46 is pure madness, and will totally swamp the surrounding facilities, such as they are. We are already faced with a "pincer movement" from the travelling community, which has its own intricacies, please don't add to an already overloaded village, and destroy what was once described many years ago as" an unfortunate example of ribbon development"-- we like it that way, and the "lungs" of the village give us space to introduce our families and friends to wildlife and recreation.

We therefore strongly object to Planning proposal A46

John and Patricia Short

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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</table>

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I OBJECT to the lack of any evidence for the alleged housing need numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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</table>

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57</th>
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<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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</table>

I am writing to strongly object to this plan. The draft local plan includes Policy A57 which proposes 4 traveller pitches to be formally established at The Paddocks, Rose Lane.

The current occupant has temporary consent until 2018, granted by the appeal inspector in 2015; in conclusion, the inspector wrote:

"Overall, therefore, I conclude that "temporary planning permission being granted for a temporary period of 3 years."

This summary by the inspector hardly implies an expansion of the site to 4 pitches, and although the policy specifies single family occupancy, this will be impossible to control and multi-family occupancy will result, if not already in place.

Policy A57 states: "Bricks and mortar housing, or any buildings capable of being converted to bricks and mortar housing, are not appropriate and will be resisted on this site"

As has been reported, a brick dwelling has already been constructed on this site in direct disobedience to the Council's edict.

If this policy is realised, the expansion of this sensitive green belt site is likely to continue indefinitely - on the lines of the West End Farm development which we saw in 2009, which in the end was only stopped by private legal action.

So please register my STRONG objection to this plan. It is not in line with the Green Belt regulations, is not in accord with the atmosphere of Ripley village, and has strong objections from the local residents.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: PSLPP16/6346  Respondent: 15241185 / Jill Gooding  Agent: 15241185 / Jill Gooding

<table>
<thead>
<tr>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</th>
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I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
Attached documents:

Comment ID: PSLPP16/6347  Respondent: 15241185 / Jill Gooding  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling
2. The increased volume of car traffic. A proposed development of 2,068 homes
3. The congestion this traffic will cause on the narrow rural roads in Ockham and
4. The danger this traffic will be to local cyclists and pedestrians, due to the
5. The increase in the already severe congestion on the Strategic Road Network
6. The lack of suitable public transport. The local rail stations of Effingham and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars would result in an estimated 4,000 additional cars on the roads on the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
7. The absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
8. The A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest. Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/415  Respondent: 15241185 / Jill Gooding  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
|--------------------------|--------------------------------------|--------|----------------------------------------------------------------------------------------------------------------------------------|

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I STRONGLY object to the 2016 Draft Local Plan on the following grounds:

I PARTICULARLY OBJECT to the erosion of the Green Belt.

I OBJECT to the lack of any evidence for the alleged housing need numbers

I OBJECT to the last minute inclusion of new sites with less than 2 weeks notice

I OBJECT to the limited consultation period

I OBJECT to any removal of any villages from the Green Belt

I OBJECT to a disproportionate amount of development in a single area

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as ThreeFarms Meadows (TFM) –A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/10711  Respondent: 15241185 / Jill Gooding  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I STRONGLY object to the 2016 Draft Local Plan on the following grounds;
I PARTICULARLY OBJECT to the erosion of the Green Belt.
I OBJECT to any removal of any villages from the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6348  Respondent: 15241185 / Jill Gooding  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6345  Respondent: 15241185 / Jill Gooding  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>PSLPP16/6349  Respondent: 15241185 / Jill Gooding  Agent:</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected. D3

I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>Comment ID:</th>
<th>PSLPP16/10712  Respondent: 15241185 / Jill Gooding  Agent:</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to a disproportionate amount of development in a single area

Please register my VERY strong objections to these things.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1346  Respondent: 15241185 / Jill Gooding  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the last minute inclusion of new sites with less than 2 weeks notice

I OBJECT to the limited consultation period

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3477  Respondent: 15241185 / Jill Gooding  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons. I am writing again, and I require confirmation that all of these comments together with all my previous comments are passed to the Inspector.

I object strongly to many of the things in the plan, including the following:

There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.

The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station.

I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.
I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.

I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.

I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

I consider for these reasons and many others that this plan is unsound and not fit for purpose and I strongly object to it. I would be grateful to know that my objection has been received and sincerely considered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/927  **Respondent:** 15241281 / Susan Burchett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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**Strategic Site A46 – Normandy/Flexford**

I wish to record my strong objections to the above site which has been included in Guildford Borough Council’s draft local plan.

The plan to build 1,100 homes, a secondary school, a nursing home and traveller pitches on Green Belt land is obviously developer led and no constructive thought has been given to the following:

- **Road Safety**

Glaziers Lane is an unclassified road and Westwood Lane is classified as a C-class road. The amount of traffic which already uses these roads is immense. They are often used as ‘rat runs’ by vehicles taking a short cut between the A31, A323 and the A3. Because the Lanes are narrow, cars park on the footpaths leaving no room for parents with pushchairs or carers with wheelchairs to get past them so they have to step out onto the roads in order to get past. There is no continuous footpath along Glaziers Lane and people have to cross the road at various points in order to walk on the footpath. Street lighting is also poor in Glaziers Lane. If owners of cars from the proposed housing estate are commuters there are insufficient parking spaces at Wanborough Station and this will lead to more cars trying to park in Glaziers Lane. Also, Wanborough Station car park floods when there is heavy rainfall. There is a humpback bridge over the railway line in Glaziers Lane and despite the electronic 30 mph speed signs cars often exceed the speed limit which is extremely dangerous at this point because of poor sight lines over the humpback bridge. There is also a single-way road under a railway bridge in Westwood Lane with a height restriction so double-decker buses are not able to use this route.
A nursery school is run at the Emmanuel Church in Glaziers Lane. Traffic is especially busy here when parents drop off and collect their children. A proposed entrance in Glaziers Lane to the new estate would be close to the church and, in my view, could pose safety problems for the small children and their guardians. Staff who work at the nursery school have to park in Glaziers Lane as the area at the front of the church is used as a play area for the children.

- **Services**

Glaziers Lane is prone to flooding when there is heavy rainfall and there have been problems with the sewers backing up. Our garden has been flooded with sewage in the past. Normandy also suffers from frequent power cuts so there would be extra pressure on the already stretched water and electricity services.

Extra pressure would also be put on the medical services in the village. It is difficult already to obtain an appointment at the local doctors’ surgery. The practice cannot be expected to appoint more doctors because of the influx of more people from the proposed 1,100 homes in the village. Where would these people receive medical care? This could lead to more pressure on the Royal Surrey Hospital to cover people’s immediate medical needs.

- **School**

There is no need for a secondary school in Normandy as there are places available for children at Ash Manor School and Kings College and the new Hoe Valley School. If houses are built first in Normandy these children would have to attend other local schools but if the school is built first there would not be enough children to warrant a large secondary school being built. The building of the Hoe Valley School is in its first stages and already traffic jams are building up on the Egley Road because of services being installed and the site traffic. Glaziers Lane and Westwood Lane would not be able to cope with all the extra site vehicles and traffic which would be using the Lanes for the proposed housing estate and school.

I am extremely concerned that, since the referendum Taylor Wimpey’s share prices have fallen dramatically and should permission be granted for this developer to build the 1,100 houses, the school, the nursing home and all the other services they say they will provide, they will renege on providing the land for the school because of lack of funds. Without the school there would be no need for such a large housing estate and I feel Guildford Borough Council should take their responsibility to the people of Normandy very seriously and remove this developer led project from the local plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** pslp172/1789  **Respondent:** 15241281 / Susan Burchett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A46

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**
I am writing in support of Guildford Borough Council’s decision to remove site A46 (the proposal to build 1,100 homes and a school on land to the south of Normandy and north of Flexford) and the removal of site A47 (the proposal to build 50 homes on land to the east of the Paddocks, Flexford.) The infrastructure would have been unable to cope with developments of this size, namely the roads, wastewater, sewage, flooding, electricity supply and also the health care.

I also object to the removal from the Green Belt of homes in Guildford Road, northern end of Glaziers Lane, Flexford, Walden Cottages and Palm House Nurseries traveller site. This could enable future development within these areas at a much higher density and could give greater success for future planning applications. In my opinion this is a wrong decision as these areas contribute to the ‘openness of the Green Belt.’

Thank you for listening to the views and concerns of the residents who wrote to you previously regarding the implications of the proposed building in Normandy as set out in the draft Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1714  Respondent: 15241313 / Christine Relf  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to the following with reference to the above development.

We object to the Local Plan as the development proposed is not sustainable.

We object to not protecting Green Belt land between the villages. Ripley, Send and Clandon

We object to due to congestion that development will cause to the local village roads and lack of road infrastructure.

We object to development in areas which are at risk of flooding and have done so in the past.

We object to the inclusion of the land for new on/off ramps at Burnt Common.

We object to the inclusion of the land at Garlick’s Arch, Send Marsh/ Burnt Common and Ripley.

We object to the poor air quality that extra traffic will make within the villages as traffic use to connect with M25 and A3 every day.

We object to the lack of proper infrastructure planning for site .

We object to 400 houses and 7000 sq meters of industrial buildings opposite Send Marsh road. The site floods and is covered by ancient woodland. The industrial space is not needed but if it were it should be at Slyfield. Guildfords housing requirements have been shown to be grossly exaggerated and they have refused to disclose their calculations. With proper use of brownfield sites this Green belt is not needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<th>Comment ID: SQLP16/351</th>
<th>Respondent: 15241313 / Christine Relf</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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<tr>
<td>I object to the building of 400 houses and 7000 sq meters of industrial space at Garlick Arch opposite Send Marsh Road.</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to an ancient woodland being used (and is Green Belt land) as a new housing development</td>
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The traffic through the village are a rat run from Woking to A3 and M25 the traffic is at a stand still every morning and we are unable to go out.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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This site floods and any industrial space should be at Slyfield.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I object to removing Ripley, Send and Clandon from the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Respondent: 15241313 / Christine Relf</th>
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<tr>
<td>Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A42</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I Object there is too much traffic in our villages already.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  pslp172/1693  Respondent: 15241313 / Christine Relf  Agent: |
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<td>Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

Policy A42 Clockbarn Nursery, Tannery Lane

1) to the increase to 60 homes in place of 45 homes is 33% and too much for our area.
2) It ignores all the hundreds of previous objections made by local people.
3) It will worsen access and traffic problems in Tannery Lane and at the A247 Junction.
4) It will make erosion of the Green Belt in our village worse.
5) It will make surface water flooding, which is already bad, even worse.
6) It will impact open countryside views from the River Wey Navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy A43 Land at Garlick’s Arch, Send Marsh.

1) it ignores all the thousands of previous objections made by local people.
2) there is no proven demand for Travelling Showpeople plots in this location.
3) it is beautiful permanent Green Belt and no “exceptional circumstances” exist.
4) it will cause over-development of our village and the number of homes is excessive.
5) it is exquisite ancient woodland that existed the time of Elizabeth1.
6) it will join up Ripley and Send and defeat the key purpose of Green Belt.
7) it is subject to frequent flooding and is currently a flood zone 2 allocation.
8) it is contaminated by lead shot accumulated over fifty years.
9) it will generate excessive traffic that will block up the local roads of Send and Ripley which have very heavy traffic now without accommodating extra traffic this will cause.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Policy A58 at Burnt common

1) there is no need to build industrial or warehouse development in the middle of Green Belt when Slyfield and Guildford still have empty sites and industrial units.
2) the impact on small surrounding roads will create traffic gridlock.
3) it will join up existing villages and defeat the purpose of Green Belt.
4) the 2017 employment land need assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/1695  Respondent: 15241313 / Christine Relf  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Comment ID: pslp171/465  Respondent: 15241313 / Christine Relf  Agent:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Green Belt, Policy 2 at paragraph 4.3.15

1) it is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation.

2) there is highly restricted vehicular access along Tannery Lane in both directions.

3) further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/357  Respondent: 15241345 / Peter Relf  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to building 400 houses and 7000 sq metres of industrial space at Garlick Arch.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/358  Respondent: 15241345 / Peter Relf  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to Green Belt fields and ancient woodland being used.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/359  Respondent: 15241345 / Peter Relf  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This will cause more traffic impacting already over used roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/360  Respondent: 15241345 / Peter Relf  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Ancient woodlands and Ripley, Send and Clandon being removed from Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/361  Respondent: 15241345 / Peter Relf  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to development in areas which are at risk of flooding and have done in the past.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>The roads are used as a rat run from Woking to M25 and A3 already and cannot take any more traffic than we already have. You are not caring regarding the quality of poor air we concerns local village people.</td>
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<td>I do not agree</td>
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I do not agree the proposed submission is sound. The infrastructure can not cope with the current load, roads are narrow, speeds are increasing on the roads due to the village been used as a cut through

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID: PSLPA16/656  Respondent: 15241921 / Donald Jolliffe  Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send</td>
</tr>
<tr>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): (No)</td>
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</table>

I disagree with the suggestion to remove East Horsley from the greenbelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the proposed development at Send Hill, because I understand that the area for the proposed development would be where there was a landfill and there are pollutants as well as dangerous gases that if released, would cause concern of the health of the people in Send Hill and areas around. I moved to Send Hill so that in my wives later age she can have a better health. She suffers from **Asthma** & other breathing problems. I am not happy at all about this proposed site as I believe this proposed plan did not consider peoples views and so is illegal.

There are NO changes I can think of that would work in this area, for the reasons I have mentioned above. I am just a retired man who wants a better quality of life for my wife and myself. If this land is 'worked on' I hope Guildford County Council realizes that there may be serious consequences for the chamber to face.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1666  Respondent: 15241921 / Donald Jolliffe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Send village being removed from the Green Belt. On section 9, paragraph 79, of the Planning Practice Guidance. communities.gov.uk, "The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open: the essential characteristics of Green Belts are their openness and their PERMANENCE" Who gave you the right to change something that has and should be PERMANANT?

You should reconsider this move as it will alienate Guildford Council from it's residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/808  Respondent: 15241953 / J Parkes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The document does not cooperate and listen to the views of the ACTUAL PEOPLE that live in the green belt. Some big wigs trying to make some money do not have as valid an opinion and say as the people that already live somewhere and DON"T WANT TO SEE THE PLACE RUINED.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/371  Respondent: 15241953 / J Parkes  Agent:
Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

The evidence is based on skewed data which is inward facing and does not reflect ALL needs of the EXISTING community. We do not need to bring hundreds of new people from different countries [Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/370  Respondent: 15241953 / J Parkes  Agent:

Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

The argument that a high school is needed in the area is not valid as the only reason we would need one is due to an influx of residents at one time such as a whole new development of houses. The village is great the way it is and you are going to negatively impact our way of life by bringing in so many new people at once

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/809  Respondent: 15242305 / Matthew Hawksworth  Agent:

Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

- destroy views from the Hog's Back ridge

- a nationally designated Area of Outstanding Natural Beauty

- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt increase tail backs on the A31 and traffic congestion

- result in rat-running through local roads

- add to Guildford's pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/823  Respondent: 15242593 / Elizabeth Cook  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A22

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to any form of building on our green belt, especially the building of 140 new homes and a care home. The issue raised about the park and ride in previous years are still the same. We cannot withstand any more traffic on our small roads, pollution, light pollution, increase noise, over crowded schools, surgeries. Our infrastructure can not cope why do you want to ruin what lovely outlook, our houses have. Please read my objection, as I feel very strongly about this, we deserve a say in what is planned for our green belt we need to protect it. We say No No No

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/825  Respondent: 15242625 / Duncan Pakman  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:
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- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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Comment ID: PSLPS16/830  Respondent: 15243425 / James Anthony Pereira  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/832  Respondent: 15243521 / Barbara Raine-Allen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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- add to Guildford's pollution.

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Recent and compelling evidence has shown that Guildford has greatly over-estimated its population growth. Guildford's proposal for more than 12,426 homes (plus a buffer of 1,155 homes) is excessive and will result in needless loss of Green Belt and green character, and increased congestion, that cannot be justified in our already constrained borough.

Allocating too much land for development in the 2017 Plan will result in Guildford being required to provide homes for Woking on our Green Belt, which is irrational and reckless given the severity of congestion in Guildford, a gap town set in the Surrey Hills AONB. We do not need to sacrifice so much Green Belt nor increase town cramming simply to provide for Woking's unmet housing needs. We will be sacrificing our Green Belt to protect Woking's, and I strongly oppose this.

We need our Plan to be based on real figures, not one with inadequate infrastructure and destruction of Guildford's precious green character.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPS16/1201  **Respondent:** 15244097 / Persimmon Homes (Craig Hatton)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A40

Do you consider this section of the document; complies with the Duty to Cooperate? (No), is Sound? (No), is Legally Compliant? (No)

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

Please refer to the attached representations which includes our comments in greater detail

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:** [Horsley reps.pdf](8.2 MB)

---

**Comment ID:** PSLPP16/2317  **Respondent:** 15244097 / Persimmon Homes (Craig Hatton)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? (No), is Sound? (No), is Legally Compliant? (No)

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

Please refer to the attached representations in section titled "Policy D2: Sustainable design" for our comments in detail

[Relevant comments from attachment added below - Planning officer]

**Policy 02: Sustainable design, construction and energy** This policy is unsound in parts and conflicts with national policy:

This policy does not support the requirements of sustainable development

Sustainable development is a golden thread which runs through the National Planning Policy Framework. As a result, all development should be achieving sustainability as part of overarching planning policy. Persimmon Homes ensure that all development sites are in sustainable locations and look to achieve the highest levels of sustainability.

This Policy states that strong support will be given to proposals for zero carbon development. As part of such development the following are set out as points that must be delivered as part of any new development:

- The highest levels of energy and water efficiency that are achievable and,
- The lowest level of carbon emissions that is achievable

As with Policy H2 regarding Affordable Homes, Persimmon would not support proposals that result in unviable development. There is ambiguity as to what 'the lowest level of carbon emissions' means and we have reservations about its enforcement. Further down in the policy there is mention of a requirement to achieve a reasonable reduction of at least 15%. It is unclear as to whether this figure relates to the lowest level of carbon emissions that is achievable or if this is a set figure which has to be achieved. In addition to this, the planning contributions SPD has an existing requirement for a reduction of 10% for carbon emissions.

Persimmon Homes have reservations that any change from the existing reduction of 10% would have an impact on the viability of future schemes. We are unsure as to whether it would be practicable for delivery of the level of housing
required if an increase in reduction was required. In addition to this, Persimmon also has reservations about the practicality of having all developments connect to (C)CHP distribution networks as there are a number of areas within Guildford where such a connection will not be possible. This will therefore have a further impact on the viability of schemes and will restrict developments to particular areas, in a borough which is already heavily restricted by Green Belt. It is arguable that this policy does not align with sustainable development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  [Policy reps.pdf](1.0 MB)

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<thead>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

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- The lowest level of carbon emissions that is achievable

As with Policy H2 regarding Affordable Homes, Persimmon would not support proposals that result in unviable development. There is ambiguity as to what 'the lowest level of carbon emissions' means and we have reservations about its enforcement. Further down in the policy there is mention of a requirement to achieve a reasonable reduction of at least 15%. It is unclear as to whether this figure relates to the lowest level of carbon emissions that is achievable or if this is a set figure which has to be achieved. In addition to this, the planning contributions SPD has an existing requirement for a reduction of 10% for carbon emissions.

Persimmon Homes have reservations that any change from the existing reduction of 10% would have an impact on the viability of future schemes. We are unsure as to whether it would be practicable for delivery of the level of housing required if an increase in reduction was required. In addition to this, Persimmon also has reservations about the practicality of having all developments connect to (C)CHP distribution networks as there are a number of areas within Guildford where such a connection will not be possible. This will therefore have a further impact on the viability of schemes and will restrict developments to particular areas, in a borough which is already heavily restricted by Green Belt. It is arguable that this policy does not align with sustainable development.

I trust that everything is in order and that the above comments are helpful, however, should you require any further help then please do not hesitate to contact me.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2301    Respondent: 15244097 / Persimmon Homes (Craig Hatton)    Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Please refer to the attached representations in the section titled "Policy H2: Affordable Homes" for our comments in detail.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Policy reps.pdf (1.0 MB)

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Comment ID: PSLPP16/4522    Respondent: 15244097 / Persimmon Homes (Craig Hatton)    Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This representation has been prepared by Persimmon Homes and constitutes Persimmon Homes Limited's formal response to the above consultation. These representations cover our responses to two policies which are included within the emerging Local Plan. As part of the Persimmon Group, the company represents one of the largest house builders in the UK and is a significant stakeholder with a vested interest in the long-term future of Guildford Borough.

We would like to submit the following representations on the Local Plan and we would welcome, in due course, participating in hearings of the Examination in Public.

Policy H2: Affordable Homes

The policy is unsound because it is contrary to national policy: the increase proposed is not supported by evidence and is unjustified.

This policy states that "on sites providing five or more homes, or sites of 0.17 ha or more regardless of the number of homes. At least 40 per cent of the homes on these sites must be affordable homes". This equates to at least 5,544 affordable dwellings over the plan period.
Persimmon Homes accept that there is a need for affordable housing as part of residential development within the borough. Persimmon Homes are also willing to contribute positively to assist in increasing the supply of affordable housing within the borough.

Guildford is subject to a number of significant constraints to housing development such as the high level of Green Belt land which limits the amount of land available for development that does not carry this designation. It is important that, given Guildford's housing needs of 693 dwellings per annum, the Borough remains an attractive proposition for developers in order to deal with this challenging housing need. The West Surrey Strategic Housing Market assessment (SHMA) highlights that across the Housing Market Area (HMA), comprising Guildford, Woking and Waverley, it is Guildford which has the highest level of under-supply with a shortfall of 419 dwellings against its housing requirement. There is, therefore, a concern that Guildford will struggle to achieve the housing requirement, or close to it, due to a pre-existing under deliver on a housing requirement of 322 dpa which is significantly lower than the need as set in the emerging Local Plan of 693 dpa.

It is understandable that an increasing housing requirement will naturally lead to an increasing affordable housing target, however we do not believe that this warrants a 15% increase in affordable housing provision. The Local Plan 2003 set out a requirement of 25% of all new developments to provide affordable homes. This was supplemented by the Planning Contributions Supplementary Planning Document (SPD) which set the affordable homes requirements at 35% in 2011. Using this as a starting point, there is insufficient evidence to justify an increase up to 40%. By increasing the affordable housing requirement this will jeopardise delivery. Guildford has shown under-delivery with the affordable homes requirement of initially 25% and then subsequently 35% and so there is no evidence to show that delivery will increase sufficiently to justify a further rise in affordable homes requirements. Any increase will impact on the viability of schemes which are already challenging to achieve within the Borough. Until Guildford can show a reasonable rate of delivery over a sustained period of time then there can be no justified reasoning behind increasing affordable homes requirements.

We would advocate that the Council should keep the affordable housing requirement at a maximum of 35% as stated within the Planning Contributions Supplementary Planning Document (SPD). The Council must deliver housing and development sites must therefore be considered to be viable. Any increase in affordable housing requirements would have a detrimental impact on the delivery of housing sites, which at this point Guildford cannot afford to do. The increase in housing requirements from the interim figure from the Local Plan 2003 of 322 dpa to the newly established 693 dpa in the emerging Local Plan will be even more challenging to deliver given the limitations on available land and the costs of acquiring land in the south-east and particularly the Surrey commuter belt. These factors must be considered when establishing if a scheme is viable and an addition of a largely unjustified increase in affordable housing requirement will only exacerbate issues of delivery and impact on the viability of such sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Guildford BC planning context & housing numbers

Guildford BC is currently in the process of producing a new Local Plan which is to cover the period 2013 – 2033 and guide development within the borough and is to be compliant with the National Planning Policy Framework (NPPF). This representation is in response to the Regulation 19 consultation phase for the pre-submission version of the draft Local Plan. Persimmon Homes are pleased to have been given the opportunity to make representations on this concerning the Site and general planning matters within the Borough. Persimmon are also pleased that Guildford BC has acknowledged the significant challenges that the borough faces in delivering sufficient housing to meet its needs. The previous interim housing figure of 322 dwellings per annum agreed on May 2012 did not take account of up to date assessments of housing need and therefore was not NPPF compliant. The reliance on this figure has meant that Guildford BC has significant under-delivered on their housing requirements over the past five years as shown in the below table:

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<tr>
<th>Year</th>
<th>Net Completions</th>
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<tr>
<td>10/11</td>
<td>190</td>
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<tr>
<td>11/12</td>
<td>262</td>
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<td>234</td>
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<td>13/14</td>
<td>137</td>
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<tr>
<td>14/15</td>
<td>242</td>
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As the housing completions above show, Guildford has not only been under-delivering against the now up-to-date Objectively Assessed Need (OAN) but there has also been consistent under-delivery against the interim housing target, which also needs to be factored into an emerging housing target moving forward.

The most recently produced Annual Monitoring Report (AMR), published in October 2015 for the period 2014/2015 showed that net completions of dwellings in the borough for this period was 242 and that the majority of homes completed in this period are on sites of under 20 homes. As the AMR notes “the number of new homes completed this year (2014/15) is still lower than required to meet our objectively assessed need…contributes to a growing deficit of new homes”. The recommendation within the AMR following this states that “housing provision is currently restricted by the lack of available and deliverable development land in the borough….delivery rate is only likely to increase when larger areas of land are suitable and available for development”. This shows the necessity for suitable and available sites to be considered and this should apply to all sites within the borough that meet this criteria. Persimmon Homes have control of the Site through an option agreement with the landowners and the Site is available for development. The council also consider the site to be suitable for development, having identified it within the proposed submission Local Plan.

i. Objectively Assessed Need

Guildford Borough has an indentified (OAN) of 693 dwellings per annum following the conclusions of the West Surrey Strategic Housing Market Assessment (SHMA) produced in September 2015 by GL Hearn. This assessment was carried out as part of the Housing Market Area (HMA) known as West Surrey which included Waverley and Woking in addition to Guildford. Persimmon have concerns that the SHMA may have under-estimated the OAN for Guildford due to migration from London into the borough expected to increase and by downplaying the need for jobs. The most recent population projections produced by Office of National Statistics (ONS) shows that by 2037, the population of Surrey is expected to increase by over 200,000 and this increase is anticipated to be faster than previously considered based on 2012 population figures, which have informed the SHMA which in turn has informed the housing requirement for the new Local Plan. It can be expected that a large proportion of this increase will be in the West Surrey HMA due to its proximity to London, strong rail connections and reputation as being part of the commuter belt and a desirable place to live. It is on this basis that Persimmon believe that the OAN to be inaccurate and should be revised upwards taking into account the increases based on the 2014 projections as opposed to the 2012 figures. This should, in turn, mean that the housing requirements in the new Local Plan should also be revised upwards, taking into account the updated projections; the constant under delivery in recent years and the need to better allow for flexibility within the plan for economic growth reasons etc.
This point is further supported by the established planning principle of seeking to plan for balanced growth in jobs and homes where possible with a view to reducing the need to travel and commuting distances. The SHMA identifies that to support the forecast growth in employment a high level of growth is needed.

ii. Five-year supply of deliverable housing land

Paragraph 47 of the NPPF states that there is a requirement for Local Planning Authorities (LPA) to “identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5%...where there has been a record of persistent under-delivery of housing, LPAs should increase the buffer to 20%”. It has been established that GBC cannot demonstrate a robust five year supply of deliverable housing land and at best the Council can show 2.5 years supply whilst at worst this drops to 1.4 years. It is also clear that Guildford has persistently and consistently under delivered and therefore those sites, which are capable of coming forward sooner should do, without being fettered by ill conceived policy requirements.

ii. Housing requirements within new Local Plan (2013-2033)

The pre-submission version of the draft Local Plan makes provision for the delivery of 13,860 new homes over the plan period (2013-2033). This equates to 693 dwellings per annum which matches the identified housing need through the SHMA. The draft Local Plan states that “the delivery of new homes is expected to increase over the plan period, reflective of timescales associated with delivery of strategic sites”. The draft Local Plan sets out the housing delivery in different tranches as below:

Annual Housing Targets (as set out in the draft Local Plan – Policy S2)

The above shows that there is proposed to be an increasing level of delivery over time as the plan progresses through the plan period. On this basis, to ensure the minimum housing requirements are achieved, over the first five years of the plan an average of 693 dwellings per annum are to be delivered. This raises an immediate concern given that GBC cannot demonstrate a five year land supply of any better than 2.5 years. As the net completions table also shows, the first two years of the plan period 2013/14 and 2014/15 have delivered significantly fewer than 693 dwellings per annum. We are concerned that insufficient sites have been identified to deliver this housing provision and concerns particularly over the deliverability of Wisley Airfield. Should the airfield be unable to deliver the allocated 2068 dwellings as proposed, then this number will have to be subsumed in other areas and given the local opposition to this scheme and impact on the highway network the deliverability of Wisley Airfield must be strongly questioned.

It is therefore clear that the evidence used for the Proposed Submission Local Plan Strategy from a housing perspective is not adequate or up to date.

Does the SHMA use the latest housing projections?

In addition, for those reasons above, whilst we recognise that the council has made some difficult decisions concerning some of the large strategic allocations, these are by their very definition slow to deliver units and it is clear that the council are not planning to deliver any meaningful increase in supply in the short term and for these reasons, those sites which are capable of delivering units quickly within the first five years of the plan should be considered favorably; this includes land to the east of Foreman Road, Ash.

With regards to more specific comments, Persimmon Homes are pleased that both policies A29 and A30 identify the site for development, however, we do not believe for those reasons below, that the identification of a road through part of the site is appropriate; feasible or indeed the correct approach. For the reasons set out below it is therefore clear that the evidence used for the Proposed Submission Local Plan Strategy and Sites is not adequate, up-to-date or indeed relevant.

The following comments should be read alongside the Odyssey Markides Technical Note dated July 2016, which accompanies these representations. We have drawn some of the comments within the Technical Note out, but expansions of these points are made within the note.
Two land allocation policies of note in the draft LP are Policy A29 and Policy A30. Policy A29 is a land allocation for up to 1,200 dwellings on land adjacent to that in control of PHTV, between Foreman Road and Harper’s Road, as well as other small areas to the west. Policy A30 allocates land which is, in part, under the control of PHTV for provision of a new railway over bridge for vehicles and pedestrians. This new bridge will facilitate the closure of the existing level crossing on the A323 Guildford Road allowing unrestricted movement along the A323 and safer crossing for pedestrians; refer to Drawing A/GBC-ASHSTATION.1/04 (Mayer Brown, November 2015).

Having reviewed the proposed railway over bridge it is apparent that it has been designed with some relaxation in Design Manual for Roads and Bridges (DMRB) standards applied, in order to allow the bridge to closely align to the existing route of the A323. A 30mph design speed has been used, with 90m forward visibility provided.

Based on this data it is considered that although implementing a new bridge over the railway line would be effective in reducing delay to the local highway network, it is not necessary in highway capacity terms as the operation of the level crossing would still be within capacity even after the LP developments are implemented.

The new bridge is set out in the Guildford Borough Transport Strategy 2016 as Local Road Network (LRN) Scheme LRN21 ‘New road bridge and footbridge scheme to enable level crossing closure on A323 Guildford Road adjacent to Ash railway station’. Its status is ‘Anticipated’ and its estimated cost is ‘£15m’, with delivery between 2017 and 2026.

Those schemes categorised as anticipated are ‘subject to a positive business case, funding can be secured, and planning and statutory approvals are likely to be achieved’.

The GBC Infrastructure Schedule, contained in Appendix C of the draft LP, states that the likely cost is £15m and the likely funding sources will be developer contributions, Local Growth Fund and from Network Rail. This document sets the delivery timescale as between 2018 and 2022.

It is reasonable for some material funding to come from developers of ‘Land to the South and East of Ash and Tongham’ for 1,200 residential dwellings, as set out in Policy A29.

It is however understood from the Enterprise M3 Local Enterprise Partnership (LEP) that there has been no submission made to the LEP for funding. The latest Expression of Interest (EoI) for the Enterprise M3 Local Growth Fund closed on 31 March 2016. This EoI allows for funding requests for schemes up to the year 2020/21. As the new railway bridge is stated as being delivered before 2026 it is therefore concluded that either (1) the bridge would be funded by developer contributions and Network Rail only or (2) that LEP funding will be requested in future and the delivery of the bridge would occur towards the end of the suggested delivery timescales (i.e. 2026).

It is not clear how much funding Network Rail would be providing for this new bridge. Network Rail would likely have to also fund a new pedestrian / cycle footbridge with lifts in order to maintain, or improve, the current level of accessibility for local residents. Relying on pedestrians and cyclists using the new bridge would be contrary to this given the material greater distance to cross the railway line and the steepness of the proposed crossing. The cost of the footbridge with lifts could be c.£1.5M.

It is therefore unclear why GBC would classify this new bridge as ‘anticipated’ rather than ‘aspirational’. Aspirational schemes are classified as ‘a strong business case will need to be demonstrated in order to secure funding as the estimated cost presently exceeds typical funding envelopes and / or there are significant planning and statutory approvals to be achieved’.

No details are publically available with respect to the vertical alignment of the new bridge; however, it appears that the northbound forward visibility over the bridge would be materially compromised.

This is due to the gradient of the road between Foreman Road and the crest of the bridge, which would likely materially reduce the forward visibility in the vertical plane.

The forward visibility would also be impinged by the actual bridge structure. The bridge would need material safety structures and barriers along the edge of the parapets and embankments for both pedestrian and driver safety. As these
would be a solid structure of over 600mm in height it would therefore compromise forward visibility, especially in the northbound direction.

Although it is understood that the location of the bridge was chosen to align as closely to the existing alignment of the A323 as possible, this alignment is not considered feasible.

It is also clear that no discussions have taken place between the parties over the delivery of the wider scheme and there is no common agreement over delivery, timings and funding etc and therefore piecemeal development will continue to come forward in the short term, further impacting upon the aspirational road scheme to come forward.

For those reasons listed above we therefore are of the view that the plan is unsound, because it is not justified, effective or indeed consistent with national policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?


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For those reasons set out above we do not believe that the Proposed Submission Local Plan: strategy and sites as a whole is legally compliant. We have set out suggested changes under question 3 below.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

For those reasons set out previously we do not believe that the plan as proposed is sound. Whilst the concept within A30 of a road bridge, is a sound one, it is obvious that the evidence base supporting both its identification and indeed location are fundamentally flawed.

A more appropriate approach would see the complete delivery of land east of Foreman Road for residential development, with land being safeguarded for the delivery of a pedestrian crossing. The road bridge could then be delivered more appropriately within the major development area. This would allow units to be delivered early within the plan period, which as has been shown previously is much needed and more importantly, will allow the delivery of a new bridge, which has been designed properly, is deliverable, appropriate and capable of serving not only existing residents, but also future ones.

It is not considered that the new rail bridge is required at this time, as the vehicle queues at the existing level crossing clear between the time that the barriers are down and as already determined by SCC the crossing would still operate within capacity even in 2031 with the addition of the LP sites.

It is however considered reasonable that there is a long-term desire to close the level crossing and provide a bridge over the railway line. It is indeed Network Rail policy to close level crossings wherever possible, in order to improve pedestrian safety and reduce rail related accidents.

If it is accepted that the level crossing should be closed and an overbridge provided in the long-term, it is considered that there is a more suitable location for the new bridge. It is considered that the bridge should be located further southeast. This would then sit across the land between the A323 and the Policy A29 land boundary and within the latter itself.

This has a number of benefits, most notably there would be more land for the road alignment to be designed to allow for sufficient forward visibility, both in the vertical and horizontal planes.

There is also the potential for a new comprehensive link road to be established between the A323 Guildford Road, through the ‘Land to South and East of Ash and Tongham’ site, to South Lane. This link road would then continue through the ‘Land South of Ash Lodge Drive’ site, as per their planning permission, to Manor Road.

The northern end of the link road could realign Guildford Road into the ‘Land to South and East of Ash and Tongham’ site, which could then provide the new bridge within land under this site’s control. This could also have the benefit of enabling the parcel of land to the north of the railway line (and west of the new road) to realise a car park or drop-off area for Ash Railway Station.
The new bridge over the railway line could also be designed to have less environmental impact, than the current proposed alignment, as it could be fully designed into the proposed 1,200 residential unit development. The spine road, south of the railway line, would connect south to South Lane and also connect to Foreman Road thus giving alternative routeing options for both development and through traffic.

The principle of a new railway bridge to come forward in the long-term alongside the closing of the level crossing is accepted; however, it has been demonstrated that this is not required in the short-term.

Furthermore, it is considered that in order to realise a suitable design, and thus implementation, a revised alignment would be needed. A more suitable and achievable location for the bridge, and the alignment of the A323 either side of the bridge, would be for it to align through the Policy A29 site. This could enable the bridge to be designed in accordance with DMRB standards with suitable forward visibility achieved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Please see our comments and responses under question 1. Whilst the council should be applauded for making difficult decisions with regards to the increase in the housing numbers to be planned for and indeed decisions associated with Green Belt releases it is clear that the Duty to Cooperate has not been met with regards to seeking to meet the needs from London for example.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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We would like the opportunity to attend the Examination in Public as we believe that the comments, recommendations and observations we have made need to be discussed in a public arena and so that we can outline the reasons for the emerging plan failing the soundness tests as drafted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4084  Respondent: 15244097 / Persimmon Homes (Craig Hatton)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A40

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This comment refers directly to the draft allocation Policy A40: Land to the north of West Horsley.

This policy remains unchanged and Persimmon Homes support this. The majority of the land included within the draft allocation is land owned by Persimmon Homes. Persimmon are the UK's largest house builder with the resources and desire to build out this site. The land included within this policy remains available, developable and deliverable within the next five years. Persimmon are however concerned by the inclusion of the element of self-build and custom house building plots within the allocation. The inclusion of this is not based on any evidence formally published which suggests that there is a need or demand for these plots on this site. Persimmon Homes fully intend to build out the dwellings themselves using their own resources. It is unclear as to where these self build and custom plots would be located.

This site is proposed to deliver a significant proportion of local housing needs within West Horsley and is a key site for development. It is unclear as to the level of demand in the local area for custom and self-builders and the Council register is not made public. Persimmon Homes have not been approached regarding the provision of self-build and custom plots on their owned land.

Persimmon would request that the reference to the custom house building and selfbuild plots are removed from this policy as the inclusion is unjustified. The inclusion of this will also jeopardise the delivery of a logical, sensitive housing development within West Horsley which will provide a suitable quantum of development, including affordable homes, in an area where this is much needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2229  Respondent: 15244097 / Persimmon Homes (Craig Hatton)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The proposed reduction in the housing requirement is unsound as this reduction is not justified

It is extremely disappointing that the Council have reduced their housing requirement from the 2016 iteration of the Plan to the 2017 version. Guildford's OAN has previously been identified as 693 dpa upon which the 2016 housing requirement was set, with Guildford seeking to meet its housing needs in full. This was an extremely positive step in an area where housing needs have increased significantly and where pressure for new housing is extreme. The 2017 version has lost some 1400 dwellings from the 2016 iteration, which equates to a reduction of 75 dpa over the plan period. This is a significant reduction and one which is not justified. The most up-to-date population projections produced by the Office for National Statistics (ONS) shows that by 2037, the population of Surrey is expected to increase by over 200,000 people. It can be expected that a large proportion of this increase will be in the West Surrey HMA due to its proximity and access to London and reputation as being part of the commuter belt and a desirable place to live. The OAN as calculated in the new draft Local Plan is therefore inaccurate and should be revised upwards.

The 2017 addendum to the SHMA indicates that due to changing circumstances the Borough's housing need should be reduced from 693 dpa to 654 dpa. The argument for this appears to be based on economic and migration factors. The SHMA addendum uses the 2014 household projections as the most up-to-date figures available at the time of the compiling of the evidence. These projections show a percentage increase of 1.2% from the 2012 projections used previously. The migration argument is based on both internal and international migration. The SHMA identifies that there is likely be a reduction in EU migration following the vote for the UK to leave the EU. However, as the SHMA states in paragraph 3.73 Guildford 'sees a lower proportion of EU in-migrants than was the case at a regional/ national level'. Therefore, any reduction in EU migration is likely to have little impact on Guildford. Even if EU migration is reduced, any future trading relationships established with other countries is likely to see a requirement to allow movement of people. This therefore means that there is a likely expected increase in international migration and the impacts of this do not appear to have been sufficiently assessed.

Internal migration focuses primarily on out-migration from London. At the most recent assessment, London has a substantive unmet housing need and a number of Local Authorities in London are developing Local Plans which do not appear to make concerted efforts to deal with this unmet need. The SHMA addendum identifies that migration flows from London to Guildford have been steady since 2008/9 and there has been no increase in net flows since the end of the recessionary period which is noted as being 2012. We are concerned that paragraph 3.45 seems to dismiss any potential increase in migration from London. Whilst there still remains some uncertainty regarding migration flows over the next 10 years evidence from the GLA shows that migration patterns will move towards the levels since pre-2008. The recovery in the economy and the availability of credit has seen an increase in home ownership and mortgage applications since 2012. Therefore it can be widely assumed that an increasing number of people are seeking to purchase homes where possible. London's affordability has decreased substantially and this will have an impact on those areas around Greater London which have access into the Capital for work and leisure purposes. Guildford, with a mainline train station and proximity to the A3 and M25 is historically an area where many people re-locate to from the Greater London area. In all likelihood, it is difficult to see how over the next 10 years there will not be an increase in migration from London to areas such as Guildford. That no provision appears to be made for this and paragraph 3.46 argues that there are no signals for a return to increasing levels of migration should be given limited weight as this is based on a single year of evidence.

There is an increasing need for housing in the Borough and this is coupled with an increasing requirement for affordable housing. The 2017 addendum shows that the need for affordable housing has increased to 517 dpa from the 2015 SHMA figure of 478 dpa and this is supported by paragraph 5.32 which states that 'it is clear that house price growth has accelerated in the Borough since mid-2013'. This affordability issue has been substantially affected by the low levels of housing growth in Guildford. In seven of the past eight years, Guildford has significantly underdelivered against its housing requirements. For the past seven years in a row the Council have delivered barely half of its annual housing requirement and this significant underperformance has enhanced levels of unaffordability in the Borough and is a strong justification as to why the Council should not be looking to further reduce its housing requirement. Paragraph 5.49 states that 'the analysis indicates that 629 dpa would be required to support the rebased SNPP ....... to support economic growth, a marginally higher level of housing provision at 631 dpa would be required'.

The 2017 addendum shows an increase in household projections, an increasing need for affordable homes and no consideration of the impacts of likely increased migration from London, suggests that insufficient uplifts have been included to account for these increases. The decreasing affordability is exacerbated by the Council's persistent under-
delivery against its housing requirement and therefore there is no justification as to why the requirement should be reduced in this Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2230  Respondent: 15244097 / Persimmon Homes (Craig Hatton)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Guildford Local Plan is unsound as the identified housing delivery strategy is ineffective

Persimmon Homes believe that the proposed housing trajectory and the process of delivery is flawed and will result in significant under-delivery of expected units. The removal of the Housing Trajectory within Policy 52 is concerning and this now places a greater emphasis on the delivery towards the end of the plan period. This approach places a significant risk that the Plan may fail to meet its housing requirement particularly when there is an over-reliance on large sites being delivered for this period. This will leave the Council in a difficult position as there will be little time afforded to make up any shortfalls in delivery. This approach appears to be a way of the Council delaying development until as late in the plan period as possible and there can be no element of positive planning about this. The Council must consider smaller sites which are capable of delivering a sufficient quantum of development to run alongside the larger strategic sites. The Housing White Paper (HWP) has referred to the importance of including smaller sites to ensure a consistent supply is maintained.

The issue of deliverability is exacerbated by the Council's inability to demonstrate a five year housing land supply. The Council are unable to show this for the first 5 years of the plan period when it is in operation. There are severe concerns over the delivery of some of the larger sites upon which the Council are relying. The Plan proposes that smaller sites will deliver in the first five years with the larger strategic sites delivering in the 6-10 and 11-15 year periods. This back loading of the majority of development is concerning particularly when there are deliverability issues with some of the strategic sites such as Wisley Airfield. A planning application was refused for this site and an appeal to be heard later in the year. Neighbouring authorities Mole Valley and Elmbridge objected to this proposal and Highways England have previously raised concerns over the impact that this development will have on the A3 and M25 at junction 10.

Paragraph 47 of the NPPF states that there is a requirement for Local Planning Authorities (LPA) to "identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements". It has been established that GBC cannot demonstrate a robust five year supply of deliverable housing land and at best the Council can show 2.1 years supply. Guildford therefore need to make more land available for development as without this Guildford cannot expect to be able to show a five year supply. Guildford have removed sites from this draft of the Local Plan which are in the Green Belt and considered to be sensitive. Guildford should be looking to allocate smaller sites, which are able to contribute to providing for housing delivery in order to ensure a rolling five year land supply. The NPPF at paragraph 83 states that "Green belt boundaries should only be altered in exceptional circumstances" however we would advise that the inability to show a five year land supply should be considered to be exceptional circumstances.

In terms of an approach to assessing the five year supply it appears that the Council are favouring the Liverpool method which will see the backlog delivered over the life of the plan period. This does not accord with national policy which suggests that the Sedgefield method should be used which aims to deliver the backlog as quickly as possible and ensures
that development is not delayed. In addition to this the Council propose to use 20% buffer which we would agree with given the past delivery problems. We believe that the Local Plan is unsound as the current proposed housing trajectory is ineffective and will not provide the full housing requirement over the plan period. There is too greater a reliance on large sites and the Council should be looking to bring forward smaller sites earlier in the Plan period in order to be able to demonstrate a five year land supply.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp17q/412</th>
<th>Respondent:</th>
<th>15244097 / Persimmon Homes (Craig Hatton)</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

The reduction in housing requirement for the Plan to 12,426 dwellings means that the Plan is unsound as the Council have failed to positively plan for meeting the needs of the Housing Market Area (HMA).

Persimmon are concerned that Guildford's co-operation with the neighbouring authorities within its HMA is insufficient. The HMA is made up of Guildford, Waverley and Woking of which only Woking has an adopted plan in place. Woking's Core Strategy sets out its housing requirement as 292 dpa which is 225 units below the OAN identified within the 2015 West Surrey SHMA. This results in significant unmet needs yearly and there appears to be no effective cooperation ongoing within the HMA to meet these unmet needs.

Due to the significant amount of unmet needs within the HMA it is unjustified for Guildford to consider reducing its housing requirement by 1400 units. It is unjustified on the basis that there is insufficient evidence to show that reducing its requirement is necessary and that Guildford appear to have made no attempts to assist with meet some of these unmet housing needs. The on-going examination of the Waverley Local Plan has also brought this issue to the fore. The inspector made reference to the unmet need generated within the HMA and has strongly intimated that Waverley and Guildford should be seeking to accommodate the unmet need from Woking. Similar examinations at Mid-Sussex and Horsham have resulted in recommendations that both of these authorities take 150 units each of Crawley's unmet housing needs. Horsham's plan was adopted with this requirement included and it appears that Mid Sussex's Local Plan will only be found sound if this contribution is also made in addition to increasing their housing requirement.

The SHMA addendum has been produced solely to inform Guildford's Local Plan and not in conjunction with the HMA as a whole. Therefore this addendum has only considered Guildford's needs into account rather than also considering those of the HMA. If the Council believe that a reduction was justified then the impacts of this should have been considered on the wider HMA however this does not appear to have been the case. On this basis, it can not be said that the duty to cooperate has been met and the Local Plan cannot be found sound.

As a result of this, Guildford's approach will only continue to exacerbate issues of unaffordability and increasing unmet needs for the HMA. That no consideration has been taken to dealing with the existing unmet needs is concerning. GBC by reducing their housing requirement are contributing to these unmet needs and this approach cannot be justifiable in the face of increasing unaffordability and demand. The suitability of the figures used to determine the new housing requirements are questionable in their soundness. An appropriate strategy, if the OAN were to be 654 dpa, would be to provide for an additional contribution towards the unmet needs in the HMA. The Inspector at the Waverley examination has recommended that a 150 dpa contribution be made towards these. Whilst it is accepted that Guildford's LP will be examined separately, the needs of the HMA are an important factor to which significant weight should be afforded.
Therefore, Guildford should be taking consideration to a similar provision to be included in the Local Plan. On this basis, it cannot be said that the plan has been positively prepared as require by the NPPF and therefore cannot be found sound.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/411  Respondent: 15244097 / Persimmon Homes (Craig Hatton)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There appears to be some confusion created by the conflicting Local Plan periods which are given at various stages in the draft Local Plan. The introduction section in Local Plan paragraph 1.2 states that the Local Plan is for the period 2013 - 2033 however within the Spatial Vision and paragraph 3.1, the plan is stated to cover the period to 2034 and this is the time period upon which the housing requirement is based. The plan period therefore needs clarification and is required to be clearly shown. There is no justification for the period to have been extended by a further year as most Local Plans should cover a twenty year period. Therefore, the plan period should cover the period 2013-2033 and this should be clearly shown. We would also advise that the plan period is shown on the front page of the Local Plan document to make this clear.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/839  Respondent: 15244289 / Philip John Burn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:
- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt increase tail backs on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: pslp172/341  Respondent: 15244289 / Philip John Burn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/840  Respondent: 15244449 / I Dean  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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- result in rat-running through local roads
- add to Guildford's pollution.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 15244513 / Amanda Murphy</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A21</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly support policy A21 in retaining the Westborough Allotments as allotments. I also support POLICY I4 (Green and Blue Infrastructure) in its aim of enhancing biodiversity and believe that allotments need to be specifically included in the list of green spaces in the definition of "green and blue infrastructure" in para 4.6.31 of the draft plan (page 116). As a mum of a 9 year old I have had an allotment on the Aldershot Road site for 4 years and for 4 years previously I helped another new mum with her plot on the same site. I strongly believe that allotments help physical and mental health, encourage healthy outdoor activities for whole families, help people from all walks of life interact socially about a common love of gardening, encourage healthy eating, and combat obesity.

The allotment has provided a safe place for me to take my daughter as a baby to get exercise and fresh air while also providing food for the table. As my daughter has grown she has enjoyed helping on the plot, digging, planting and harvesting. It's helped with both our wellbeing and educated her about food and where it comes from. We've also seen plenty of wild life in its natural habitat with slow worms nesting under slabs, mice in the shed and the odd brave fox. She also gets to interact with people from the older generation which gives her different and varied role models. It's a lovely oasis in an urban childhood. Even the bog toilet is an adventure.

We have adopted one of the old gentlemen as a surrogate grandad and he benefits by having a reason to visit us, to be included in our family and, get himself out and about rather than staying in and being lonely.

On our site in particular, we have a self help group WASHA which runs an educational program for children from a local school and novice gardeners. I benefited from this facility in the early years as one of the older gardeners provided invaluable mentoring. He gardens on a plot that was his dad's and which he helped on a boy so has been on the plot for 60 odd years.

Our site has been an allotment site since before the First World war. It is a site with historical value and I think it is a vital part part of the green infrastructure that enhances the landscape of Guildford. Furthermore allotments provide important recreational and health benefits for the residents of Guildford and need to be protected.

Retention of the lower vehicular access to the Aldershot Road allotments is crucial. I have one of the lower allotments and need that access point to load and unload equipment and harvests. The site is on a steep hill which makes vehicular access from the top very dangerous when the ground is wet.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:
- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt increase tail backs on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Whatever their merits as development sites, the 6 Horsley sites should not be considered individually but for their cumulative impact on the contiguous villages of East and West Horsley.

Building 533 new houses on these 6 sites, plus at least another 90 on small sites is (a) excessive in absolute terms and (b) disproportionate relative to the rest of the borough. It will destroy the rural character of these communities. "16

Under the plan, rural West Horsley will take 35% of new homes, urban Ash and Tongham 16% and Guildford urban area only 11%. The total number of homes in West Horsley will increase by 35%, which is disproportionate when measured against the overall increase in housing across the borough and particularly in Guildford town. If the Council have justifiable reasons to transform a particular community so radically, the plan should present a case rather than putting forward site proposals as a \textit{fait accompli}. 

These sites will put unsustainable strain on local facilities and infrastructure, including public transport, parking, schooling, medical facilities, sewage, surface drainage and shops. For instance:

- Thames Water have advised the Council that the current wastewater network will not cope and that the foul drainage system all the way to the treatment works North of Ripley will need to be upgraded.
- Guildford Council's Education Review says "expansion options may need to be considered for primary" education in the Horsley area within the first 5 years of the plan, but Surrey County Council have no plans to do so. The Raleigh School is already full. The private Glenesk and Cranmore schools are also at or near to full capacity. The suggestion that schools in Ripley can be used contradicts the plan's stated intention to reduce traffic on the A3 and strategic aim that primary schools should be within walking distance.
- The plan's Infrastructure Schedule (Appendix C) imagines an "East Horsley and West Horsley traffic management and environmental improvement scheme between 2019 and 2023 by Surrey CC" but gives no details. This scheme is just wishful thinking. The proposed housing can only harm the local environment, not "improve" it.

The harmful impact of these sites is magnified by the proximity of the so-called Wisley Airfield site (Three Farms Meadow), with over 2,000 new homes only 2 miles away (see below).

The density of new housing on the 6 Horsley sites is inappropriate, being greater than anywhere in the locality at present.

Sites situated on the periphery of existing development in the Horsleys encroach on surrounding open fields and require the extension of settlement boundaries for which the plan presents no arguments. Contrary to NPPF paragraph 79, this will contribute to creeping urbanisation by attenuating the Green Belt corridors separating the Horsleys from neighbouring settlements.

Collectively, these 6 sites militate against NPPF paragraph 81's encouragement of access to the Green Belt and its amenity and recreation value. This has been a success story in the Horsleys, with the creation of an amenity wood and community garden, the purchase of adjacent fields (on the eastern side of Ockham Road North) by local residents in order to preserve their open aspect, well-maintained pitches for local football and cricket clubs, public tennis courts, open space for a high-quality campsite (at Waterloo Farm) used by many foreign tourists and the approval of plans for a "Theatre in the Woods"—making West Horsley the only village in Surrey with an opera house. The open nature of West Horsley determined that a long portion of the 2012 Olympic cycle races passed through the village. This route has since been adopted by cyclists as a permanent asset, including the annual 

"14 E. Gallagher Homes v Solihull Metropolitan Borough Council [2014] EWHC 1283

"15 Councillor Paul Spooner and his predecessor, Councillor Stephen Mansbridge.

"16 Even some property developers complain about the Council's bias in favour of oversized developments, g. Dandara, whose relatively small Green Belt sites on the A246 (Epsom Road) in West Horsley is not considered in the plan.

Prudential cycle race. These and future examples of "positive planning" depend on protecting the Green Belt to maintain the openess and attractiveness of the local landscape and avoiding the urbanisation and traffic congestion that Sites A36-41 will bring.
By surrounding Waterloo Farm campsite with 120 new houses, Policy A40 on land to the North of West Horsley will make this rural tourism amenity unviable. This may accord with developers' plans, since the site would then be vulnerable to infilling with yet more housing.

Site A40 is subject to an unacceptable flood risk from a combination of a high groundwater table and the lack of surface water run-off. This is flat, clay land on the downhill side of the Horsleys where floodwater from new development will accumulate and back up onto existing properties nearby. I can provide photographs proving how badly these fields already flood at present. These problems will only get worse with the increase in extreme weather events associated with climate change. The "appropriate mitigation" suggested in Policy A40 exists only as an abstract notion. It should not overrule the need for Green Belt "exceptional circumstances".

Policy A40 underestimates the problems of safe access and egress. Firstly, Ockham Road North was closed for several weeks in 2014 because of flooding, and still floods regularly. Secondly, access problems are not confined to flooding and are not addressed by the proposal to extend the existing 30m ph zone past the site entrance. Repeated attempts made by Ockham Road North residents to extend this zone have been turned down by the local authorities, Highways England and Surrey Police, even though data collected in 2015 show that traffic has doubled over the last 15 years and that the average speed in the 40mph section of this road is 52mph, with maximum recorded speeds of over 80mph. No traffic calming measures have so far been achieved. Additional housing will add to several hazards along this stretch of road, including:

- Its use by pedestrians, especially children (using the Raleigh and Glenesk schools and catching school buses to Guildford and Howard of Effingham), pensioners living in the string of bungalows at the northern end of the road, and visitors from the Waterloo campsite who are unfamiliar with the area.
- The existence of a narrow footpath on only one side of the road in any one spot. The layout means that walking half a mile between Green Land and East Lane requires crossing the road twice.
- The road's increasing use by recreational cyclists (see above).
- Its winding nature, poor sight lines (especially when interrupted by summer vegetation) and dangerous, concealed driveways. Most of these were built in the 1930s. Some have been widened but many are too narrow for modern traffic. Since a deep ditch runs along most of the road, vehicles have to swing out dangerously when entering or leaving.
- The prospect of additional traffic, including 19,000 HGV movements (90 a day over a long period) if Surrey County Council approves the Drift Golf Course's planning application to re-landscape its site using bulk waste transported from London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. Three Farms Meadow site

I OBJECT also to there-inclusion in the plan of Policy A35 (land at Three Farms Meadow, alias the former Wisley airfield, Ockham). Following a huge public outcry, Guildford Planning Committee have unanimously rejected a recent planning application for precisely this development on 14 separate grounds. This deceived many residents into thinking that it has been defeated. Scandalously, the site had been reinserted into the new draft local plan published just 24 hours before the planning decision - a clear signal to the developers to try again.

This is not an NPPF "presumption in favour of sustainable development" but a predetermined bias in favour of specific applicants, who had already been given many additional months to refine their application before it was rejected. Residents are disturbed by apparent political links between the ruling Conservative group on the Council and individuals connected to the developers, a shadowy Cayman Islands company. 

Policy A35 should be ditched from the plan for all the reasons the development was rejected by the Planning Committee, including:

- Green Belt location and absence of "exceptional circumstances".
- Misrepresentation of the site as brownfield land: 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remains of the runway (14ha) are a habitat for rare flora and fauna and has never had any buildings on it.
- Proximity to RHS Wisley and Thames Basin Heath Special Protection Area (TBHSPA).
- Proximity to A3/M25 bottleneck and Ripley village and roundabouts.

"17 Application reference 15/P/00012.

"18 Including the Rt Hon. David Mellor QC (its erstwhile founder and former Minister), Mr Michael Murray (spokesman for the project and Conservative cabinet member for planning policy at the Vale of the White Horse District Council in Oxfordshire) and the Hon. Charles Balfour (director, descendant of the Tory Prime Minister).

- Absence of adequate traffic data.
- Further harm to air quality both onsite and nearby (e.g. the Cobham AQMA) and disregard for the health of children at the proposed secondary school.
- Loss of high-quality agricultural land (55% of the site), in breach of national policy.
- Disproportion of locating of over 2,000 dwellings within the ancient village of Ockham with just 159 households.
- Presence of a Surrey County Council safeguarded waste site.
- Cost of infrastructure required to the detriment of alternative more favourable sites.
- Lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway stations which have no spare parking capacity.
- Impact on listed buildings.
- Difficulty of SANG siting and inability to divert residents and their pets away from the SPA. Extreme housing density with tiny garden spaces.
- Damage to neighbouring communities of creating a settlement of 5,000 residents, equivalent to East and West Horsley combined, with worse light pollution, noise and traffic, and competition for local amenities and infrastructure.
- Insufficient information about the impact on the local water table and run-off (see comments on flooding in Horsley above), and the possible aggravation of downstream flooding towards the Thames (e.g. Thames Ditton, which was under water during the winter of 2013/14).19
- Failure to evaluate the cumulative impact of this and nearby development sites on the area.

*****
"19 The River Mole would flood even more badly should a new runway be built at Gatwick.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/1747  **Respondent:** 15244641 / Wesley Raynbird-Tilbury  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**POLICY D1 -Making better places**

I OBJECT to the absence of any reference to vernacular or historic design guidelines, even in Conservation Areas. Most of the borough, especially the rural areas, has vernacular design guidelines that are available to give suggestions as to appropriate design. These should have mandatory planning force.

The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design? Should it not result in better-designed buildings?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/1748  **Respondent:** 15244641 / Wesley Raynbird-Tilbury  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**POLICY D2 -Sustainable design, construction and energy**

I OBJECT. Sustainability should be an overarching ambition, conditioning the whole local plan and running through it, as claimed in the NPPF, "like a golden thread". It should be set out clearly in Policy 51, not buried away as a minor detail in Policy 02.

This policy amounts to "greenwashing", expounding aspirational environmental targets while ignoring the plan to build dormitory towns across the Green Belt that are environmentally and socially unsustainable. These settlements will bring vastly increased car use and will lead to unacceptable traffic congestion, overstretched social infrastructure, and more greenhouse gas emissions, noise and light pollution. This policy should not be just about saving energy but about preserving the borough's stock of natural capital, especially the countryside, from futile attempts to rig the housing market.
This policy's emphasis on Combined Cooling Heating and Power and communal heating networks is meaningless, since no such networks are available locally.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

**Comment ID:** PSLPP16/1749  **Respondent:** 15244641 / Wesley Raynbird-Tilbury  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**POLICY D3 - Historic environment**

I OBJECT. This policy clashes with the strongly pro-development agenda of the rest of the plan and fails to address the contradiction. History is unamenable to improvement, so the policy should commit the Council firmly to protecting and preserving our heritage assets from development. Instead, the specific policy pledge to "support development" that might "enhance" heritage assets leaves wide scope for abuse in the form of destructive commercialisation and financial leveraging of relevant sites .

This policy is based on the false premise that Guildford's heritage is inherently in decay. This is a developer's charter- a short step away from the idea that the historic environment needs to pay its way to be preserved. The Council's aggressive reviews of Guildford Museum and the Electric Theatre support this interpretation . Whatever the "reasoned justification", the actual policy wording in the blue box leaves too many loopholes.

Development close to historical assets is harmful and should be expressly prohibited. This policy fails to meet the requirements of NPPF paragraphs 126 and 131-133.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

**Comment ID:** PSLPP16/1750  **Respondent:** 15244641 / Wesley Raynbird-Tilbury  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY D4- Development in urban areas and inset villages

I OBJECT. This is a piously aspirational policy that does not address any of the obvious practical issues already touched on above:

- The plan envisages that 40% of homes built will be "affordable", but this does not provide any accommodation for low-paid workers, for example, those on the minimum wage, who cannot afford to buy so-called "affordable" homes or pay an "affordable". There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low-paid workers such as those employed in the retail, warehousing and distribution sectors (all of which this plan aspires to expand).
- The number of homes planned in the urban area is too low. There is a glaring need for regeneration in many urban areas, but this is ignored in favour of building homes on green-field sites instead. This will not address urban housing needs. It is also unsustainable, since building outside the town does disproportionate harm to road traffic, air quality and overstretched infrastructure.
- The plan envisages a large expansion of the traditional "bricks and mortar" retail sector, but this is a sector in rapid and continuous decline.
- All the stated policy aims for "inset" villages will be negated by the excessive weight of new housing development proposed which would radically change their character forever. Against this disruptive background, it is barely relevant to talk about preserving views!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1738  Respondent: 15244641 / Wesley Raynbird-Tilbury  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E1 -Meeting employment needs

I OBJECT because -

- The evidence base is unreliable;
- There is unclear differentiation between B class uses;
- Only high value-added business uses, contributing to a modern "knowledge economy", are desirable, not low-grade, low-employment warehousing which is also land hungry;
- Industrial and commercial businesses must be concentrated in the urban area or existing business parks (e.g. Slyfield) not in the rural environment which the infrastructure is unable to support;

"10 See footnote 3 above.

The rural environment must support micro- or high-tech businesses, agricultural industries, and tourism, and these sectors must not be damaged by general industrial development which is inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/1739  **Respondent:** 15244641 / Wesley Raynbird-Tilbury  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

POLICY E2 - Location for new employment floorspace

I OBJECT . It would be more sensible to confine all new office and research and development (use Class B1a and B1b) floor space to Guildford town centre. I oppose the policy of expanding the Research Park onto Blackwell Farm (see my reference to "regulatory capture" of local public policy by the University, Policy H1, above). No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/1740  **Respondent:** 15244641 / Wesley Raynbird-Tilbury  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

POLICY E3 - Maintaining employment capacity and improving employment floorspace

I OBJECT . The policy of resisting change of use from B1a to residential flies in the face of positive property market solutions for the regeneration of brownfield land and is contrary to national Government policy, recently reconfirmed, which permits changes of use from B1a (offices) to C3 (residential).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/1741  **Respondent:** 15244641 / Wesley Raynbird-Tilbury  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
POLICY E4- Surrey Research Park

I OBJECT. The Council are required by the NPPF to facilitate commercial science and technology clusters. But, as with Policies H1 and E2 above, this policy seems to be dictated more by the ambitions of Surrey University than the public interest. In an extremely tangled sentence, it says that the Research Park will be "protected for business use... in any science ... that is complementary to the activities of the University of Surrey."

This fails to distinguish adequately between the University's public role as a state-funded, academic institution and its private, financial interest in profit-making business spin-offs. It ignores enterprises that might be commercial rivals of the University. And it fails to consider the public harm done by turning the Research Park into a larger Business Park, such as the loss of Green Belt social and environmental capital.

B1b should be the primary use class for the Research Park and applications for B1a should be resisted given the danger of diluting the core purpose and reputation of the park. The inclusion of B1c uses is inappropriate and unnecessary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY E6- The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor "attractions" and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/"Disneyfication". Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many "leisure and visitor attractions" already. The case for creating more is not made and no examples are given. Instead, the plan's explicit priorities should be:

1. To protect the borough's prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford's river landscape less off-putting and support town-break packages for high-value To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

2. To help private providers market local This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An "English town break" (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to RHS Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by pass Guildford to go to Bath, Oxford or Cambridge instead.

1. To rule out the redevelopment of scarce rural hotel sites (e. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan, yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1744   Respondent: 15244641 / Wesley Raynbird-Tilbury   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY E7 Guildford Town Centre

I OBJECT. The policy "vision" refers to protecting the Guildford's "unique setting" (including, surely, its surrounding Green Belt and countryside views) but this is not carried over into the formal policy wording in the blue box. It is therefore a worthless commitment.

There should be much more residential use of the town centre where most people, especially the young and less well-off, want to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose a visionary regeneration plan for the River Way/Walnut Tree Close area, where there is arguably enough brownfield land for 4,000 new homes, meeting near all the borough's housing need over the plan period without harming the countryside. There is an urgent need for a brownfield register and to focus on brownfield redevelopment before considering development outside the existing urban area. CIL strategy must promote brownfield redevelopment.

Strangely, the policy does not address any of the major issues raised by the Council's own Town Centre Master Plan, the Guildford Vision Group's proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public debate.

This policy also fails to provide guidance on design requirements, as required by the NPPF.11

Instead, it is far too concerned with shopping. Town-centre shopping is in decline internationally as consumers move irreversibly online. There is no need to expand physical retail capacity or warehousing floorspace, which will only kill off existing shops while using up valuable housing land. The delays to the redevelopment of North Street is a flashing red light warning that consumer patterns are shifting. Guildford is a large town without a single butcher or fishmonger, showing that the Council need to use the fiscal and other mechanisms at its disposal to support niche retailers. To opt for large, impersonal department stores and dull high-street chain stores at the expense of Guildford's unique character would be an historic blunder. For this type of shopping, most residents can go to Woking or Kingston, whose ugly town centres should serve as a dire warning to Guildford planners.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1745  Respondent: 15244641 / Wesley Raynbird-Tilbury  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E8 - District centres

I OBJECT to the proposal that sites "on the edge" of District Centres should be considered for retail developments. This is another Trojan horse policy, allowing retail hubs to be vastly expanded in order to smooth the way for vast new housing estates outside in the countryside (e.g. to meet the "everyday shopping and service needs" of the roughly 1,500 people living in the 600 new homes planned for the Horsleys).

This is a case of back-to-front priorities. Expanded local retail hubs are being proposed in order to justify more housebuilding in the villages, and in a forlorn attempt to mitigate the serious traffic and infrastructure problems this will bring. The Council have no business preparing the way for new supermarkets in the Green Belt. Rural retail capacity should be left to local demand.
The policy proposes not a single measure to support existing rural shops and services that are the lifeblood of village communities, e.g. using business rates and other levers at the Council's disposal.

"11 NPPF 59: ""Local planning authorities should consider ... the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally."

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1746  Respondent: 15244641 / Wesley Raynbird-Tilbury  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E9 - Local centres

I OBJECT (for the reasons given under Policy E8 above) to the proposal for retail development adjacent to the 6 rural centres, and sites on the edge of designated centres. This is creeping urbanisation, damaging to the Green Belt and to Guildford town revival as a thriving urban hub. It will contribute to local urban decay and depopulation, just as expansion of the suburbs did to mid-20th century London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1730  Respondent: 15244641 / Wesley Raynbird-Tilbury  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H1 - Homes for all

I OBJECT. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set any rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.
The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to de-humanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

"5 This has been challenged by residents including, by Mr Ben as far as the Information Ombudsman. But the Council have consistently refused to seek disclosure of the model.

"6 See http://www.glheam.com/developer/Pages/Overview.aspx: ‘we act for many of the leading developers.’ G L Hearn is now part of Capita Real Estate.

"7 See letter from Neil Taylor, Director of Development at Guildford Borough Council, in the Surrey Advertiser of 3 June 2016: "I would like to highlight the difference between the Objectively Assessed Housing Need (OAN) figure produced by G L Hearn (693 homes per year) and the Housing Target for the Local Plan. Some opponents of the Local Plan appear to blur the edges of the two figures. The OAN figure is the one produced by the modelling tool. The Housing Target figure is the proportion of the OAN that the Council feels it can successfully deliver. Based on the infrastructure that Highways England, Surrey County Council and others suggest they can provide over the next 15 years, the Council believes it can deliver the full OAN number as the Housing Target. However if, during this consultation, or later on, the anticipated infrastructure is not going to be provided then the council will be forced to apply further constraints to the OAN number, which may reduce the Housing Target number. Therefore, it is clear that the OAN and the Housing Target are not the same. The OAN is objective and the Housing Target is subject to constraints.”

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council's timidity is a case of "regulatory capture" by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Over provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/1731</th>
<th>Respondent: 15244641 / Wesley Raynbird-Tilbury</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2</td>
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POLICY H2- Affordable homes

I OBJECT. "Affordable" homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that these homes will remain well beyond most people's means and that starter homes will not become available for local people.

In addition, the viability clause (4.2.40) means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. It is a get-out-of-jail-free card for developers that will sacrifice countryside for no local benefit.

I question the assumptions that seem to underlie this policy: that people have a right (rather than a legitimate aspiration) to own a home; that they should be encouraged to live locally (contradicting the Government's policy of encouraging labour mobility and development in poorer regions, where homes are cheaper anyway); that increasing local house-building will reduce overcrowding and congestion (rather than simply suck more people into the borough); and that it will stem the rise in house prices (even though 13,860 new homes will be a drop in the ocean, given that prices are determined by an infinite demand-pull from London, whose population is increasing by 100,000 a year, and by the currently low cost of capital for overseas and other buyers). The weak mechanisms proposed in the plan might influence the market in a more remote part of the UK, but not here.

This policy's version of "affordability" is just a smokescreen for pushing through more development generally. Building more homes in Guildford cannot increase real affordability given the overhang of the London market.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/1732</th>
<th>Respondent: 15244641 / Wesley Raynbird-Tilbury</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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POLICY H3- Rural Exception Homes

I OBJECT. This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the "mix", this can include "market" housing - i.e. normal commercial development which in Guildford usually means large executive homes. This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove "exceptional circumstances."

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY 11 - Infrastructure and delivery

I OBJECT . Most of the borough's infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. Yet this plan's commitment to building housing estates across the Guildford countryside will mean either major infrastructure investment that no-one is prepared to pay for or else a catastrophic and simultaneous collapse in transport, educational, medical, energy, water and communications services.

The plan targets greenfield sites - requiring heavy infrastructure investment - in order to generate CIL income necessary to meet an infrastructure shortfall that is already serious. This is not sensible. The current draft CIL scale also encourages development on greenfield sites rather than brownfield.

The policy wording says nothing about roads and traffic. The Council's methodology for assessing infrastructure needs in this area is inadequate, identifying only the tip of an iceberg of existing congestion. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that involve demolishing property and road-widening in residential areas to solve the resultant congestion. The A3 improvements are not guaranteed to take place but they are being used to justify removing large areas from the Green Belt before detailed traffic assessments have taken place. These detailed investigations are being deferred until the planning application stage and will be left to developers to prepare. If a site then proves to be unsustainable its Green Belt protection will have been lost for no reason and unsuitable development will take place by a more insidious process.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy 11. By prioritising greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough's infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council's control and on the vagaries of CIL income. Instead of recognising this as a key issue, the plan is based on a wing and a prayer.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY I2 - Supporting the Department of Transport's "Road Investment Strategy"

I OBJECT. This policy is too vague and optimistic. Decisions by Highways England on improving the strategic road network (the M25 and A3) are still years off. The Council have suggested a very expensive tunnel under Guildford, but this is no more than a dream. Even if Highways England accepted this (which is highly unlikely in the post-Brexit public spending climate) it would not be built until the end of the plan period at the earliest. Other, less expensive A3 improvements, and changes to the Junction 10/Heathrow stretch of the M25, will also take years to agree and complete.

The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is foolhardy. Surrey is the most congested county in England, with 683 people per square kilometre, compared with an English average of 413. This policy will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone). This is a major development constraint that should have been applied to the OAN before this consultation, and not left up in the air.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1753  Respondent: 15244641 / Wesley Raynbird-Tilbury  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY I3 - Sustainable transport for new developments

I OBJECT. This is another vaguely aspirational policy, based on wishful thinking and not grounded in the practical realities of daily life. It consists of a standard, box-ticking list of local government measures unrelated to the "12 Residents have been incredulous at the Council's failure to apply infrastructure constraints to housing numbers, in response first to the 2013 Issues and Options paper and then to the 2014 draft local plan. There were 20,000 responses each time.

specifics of the plan. Like infrastructure, transport appears to be an afterthought; the policy fails in its essential job of guiding planning decisions, since it assumes development of any kind can be supported by sustainable transport.

The sustainability of the dormitory settlements which the Council want built across the countryside depends on a general "modal shift" from private car use to walking, cycling and public transport. This is unrealistic. The proposed sites are often miles away from the nearest railway station. Bus services even in the largest villages are almost non-existent- just one bus to and from Guildford each day in the Horsleys and none at weekends. Since bus services depend on profitability, they cannot be expanded and the Council are not proposing to subsidise new ones. Rural buses are too slow anyway for busy people. Most rural roads in the borough are narrow, winding, hilly, potholed, muddy and unlit. Many flood badly and have no footpaths.

The desired modal shift would require a comprehensive co-ordination of bus and train timetables with services every few minutes, seven days a week, to stops within walking distance of every home in the borough. This kind of integrated public
transport system has been achieved in Switzerland, for instance, but only at huge public cost and thanks to a political consensus supporting state ownership of trains, buses and the post office, which delivers rural passengers as well as mail. There is absolutely no chance of this in the UK.

The vast majority of the borough's residents are not, in practice, able to cycle. This includes children, the elderly, commuters who have to look smart, the infirm, the unfit and people carrying goods or shopping of any kind. Dependence on walking and cycling discriminates against these groups, which include some of the most vulnerable members of the community. It is socially unjust.

One in two working people in Guildford commute for up to 3 hours a day, as I used to do. They will not leave their cars for even part of their journey if it means longer travel times.

Park-and-rides are a welcome part of the transport mix but are too slow for commuters and others on a tight schedule. Well-off pensioners seem to be the main beneficiaries. For an adult couple going shopping it is still cheaper to park in town.

Forget about water buses. The Wey is too narrow and, with a river speed limit of 4mph, boats are too slow for anything but recreation. Except on the tideway, not even the Thames has such services.

The addition of two new stations appears attractive but will slow down train journeys, which are already slower than at any time since the 1930s. Knock-on effects on localities where the new stations are built have not been worked out or presented.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/1754  **Respondent:** 15244641 / Wesley Raynbird-Tilbury  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

**POLICY I4 Green and blue infrastructure**

I OBJECT. This policy is a box-ticking exercise with no teeth to it. It sits oddly with the plan's onslaught on the Green Belt. The plan to build on large areas of countryside and to inset villages will cancel out any benefits from extending the principle of enhancing biodiversity beyond Biodiversity Opportunity Areas.

There is no mention of the value of wildlife gardening to biodiversity or the important role that larger gardens play in a village setting.

There is no mention of the impact of the plan on food production, or monitoring the loss of agricultural land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/1733  **Respondent:** 15244641 / Wesley Raynbird-Tilbury  **Agent:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY P1 - Surrey Hills Area of Outstanding Natural Beauty

I OBJECT. This policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. The latter welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1734  Respondent: 15244641 / Wesley Raynbird-Tilbury  Agent: 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY P2- Green Belt

I OBJECT. This policy states, "the general extent of the Green Belt has been retained." This is a lie.

The policy wording is tepid in support of the Metropolitan Green Belt even though the latter forms 89% of the borough and should be the cornerstone of all local planning policy. It is precious beyond the short-term demands of the present Government's policy or a 15-year local plan. As noted under Policy S1 above, it is a solemn legacy to future generations - an asset and amenity that belongs as much to Londoners and the whole nation as to the people who live in it. It is an inalienable public good. Once gone it is gone forever. It is not the Council's to give away.

Policy P2 omits any assessment of the Green Belt's value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. Building on it involves high opportunity costs, including an irreversible loss of:

- Agricultural production
- Rural leisure and tourism amenities
- Water catchment
- Flood control
- Biodiversity
- Natural heritage
- A carbon sink for air pollution
- Room for public facilities such as parks and burial grounds
- Profitable film locations (e.g. Shere)
- Future economic potential such as mineral extraction (even tracking)
• Natural beauty, landmarks, open space, rural views and sight lines
• Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF)\textsuperscript{6}

As a matter of law, morality and national and local policy, these assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultations.

It is disreputable to argue, as the Council do, that the plan would involve the loss of "only" 1.6\% of the borough's Green Belt. In reality the figure is nearer 7\% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no "acceptable" percentage (in the NPPF or anywhere else) of Green Belt that may be sold. No-one argues that we should sell 1.6\% of the Crown jewels in order to build houses.

I am not opposed to appropriate development in the Green Belt and recently supported a major planning application in my own village. But I fail to see why a system of fair burden-sharing of new development cannot be applied to the borough's existing settlements in proportion to their size. This alternative would minimise the strain on infrastructure and maximise the chances of retaining the character of each settlement through gradual growth. It is reasonable to ask urban Guildford, with \( x \) times the population of semi-rural East Horsley for instance, to accommodate \( x \) times the number of new homes over the plan period. Parish councils could be asked, and will no doubt be willing, to propose where their quota of houses should go. Most rural residents are reasonable people who, if not alienated by top-down planners, will support realistic numbers of new houses in their neighbourhoods. Unfortunately, this democratic, bottom-up approach has not been attempted.

Instead, while developers flip and land-bank urban sites as a financial speculation, this plan will dump most new development on greenfield sites where building costs are lower, covering the Green Belt with dozens of housing estates that few residents want. 8,086 new houses are planned for the Green Belt but only 1,135 for Guildford urban area. This is disruptive, socially inequitable and unnecessary. It will not only destroy countryside but will also delay and disincentivise much-needed urban regeneration. The remarkable revival and repopulation of central London shows that building dormitory satellite settlements is an out-of-date approach to planning.

I particularly protest at the "insetting" of 14 villages from the Green Belt, and at "infilling" 12 of the borough's Green Belt villages. I am deeply disturbed that settlement boundaries are to be hugely extended in many villages and that infilling is also proposed \textit{outside} the settlement boundaries of 11 further villages. Many Guildford villages are "leggy" in outline, reflecting the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the "openness" of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF's other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost hellbent on self-defeat.

I believe this policy is based on a flawed Green Belt and Countryside Study that, according to one Conservative Councillor, was irregularly commissioned by Council officers without the authority of Councillors.\textsuperscript{9} To "inset" two thirds of the borough's rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough's location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, although they would quickly destroy them if the proposed "insetting" and boundary extensions go ahead. This policy is wildly disproportionate in terms of any foreseeable development need (especially post-Brexit) and has caused tidal waves of
opposition from residents. It flies in the face of NPPF paragraph 17’s aim of "empowering local people to shape their surroundings" and other NPPF provisions."10

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1755  Respondent: 15244641 / Wesley Raynbird-Tilbury  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

SITES

1. Green Belt sites

I OBJECT to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that "allocating these sites does not grant planning permission for development, however, it does identify the principle of development and uses." This ignores the tens of thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. This amounts to a war of attrition by the Council in conjunction with developers, since many busy residents are sick and tired of repeating the same comments to deaf ears. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014.13 Some residents have concluded that commenting is a waste of time.

"13 Further discredited by criminality on the Council. Former lead Councillor for planning Mokija Juneja, architect of the 2014 draft plan, is currently serving a two-year sentence on 3 counts of forgery, pretending to be a barrister and obtaining dishonest pecuniary advantage.

All Green Belt sites should be removed from the plan until "exceptional circumstances" for development are proven, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. "14

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1735  Respondent: 15244641 / Wesley Raynbird-Tilbury  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY P3 - Countryside (i.e. beyond the Green Belt)

I OBJECT. This is more protective - as a policy - than the proposals for the AONB and the Green Belt, so is anomalous and wrong. I am not in favour of building on this area, since urban, brownfield areas are sufficient to meet all reasonable housing targets. There is no need to build on any green fields if brownfield, previously developed land is used efficiently (without garden-grabbing).

This policy refers to the countryside near Ash and Tongham (see paragraph 4.3.28). This area does not justify stronger policy protection than any other part of the borough. The fact that the current and previous Council Leaders represent it should not give it preferential status: "we will seek to limit any development in the countryside unless it can be demonstrated that it is necessary in that location". Green Belt and AONB areas should by definition have higher levels of protection than non-Green Belt areas.

It should also be noted that Ash and Tongham lie beyond Guildford far away from London and therefore make no contribution to controlling Metropolitan urban sprawl, unlike those villages which, ironically, are to be "inset". That is presumably why Ash and Tongham are not in the Green Belt already. This policy, however, attaches higher priority to preventing the "coalescence between the Ash and Tongham urban area and Aldershot" than it does to the primary purpose of the Metropolitan Green Belt, which is to stop London sprawl.

Apart from being a scandalous misuse of local political patronage, this policy effectively says, "Look, we are not destroying the Guildford Green Belt because we are extending it in Ash and Tongham." It is a cynical piece of tokenism. The leader of the Council needs to be seen to be above reproach by deleting this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1736  Respondent: 15244641 / Wesley Raynbird-Tilbury  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY P4 - Flood risk and water source protection zones

I OBJECT. Urban development on existing hardstanding would not create additional flood risk, especially where there is scope for improved flood resistance measures to be included in the design. Sites such as the Arriva bus depot, on the River Wey bank, are potential high-value brownfield sites that would not be available for housing if this policy is implemented. It is not the footprint of existing buildings that should limit future development, but the extent of existing hardstanding. Tarmac and concrete do not act as functional floodplain, and some land with hard standing close to the river, within the town centre and within easy walking distance of the railway station, provides an excellent opportunity for real urban regeneration that could protect the surrounding countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY P5 - Thames Basin Heath Special Protection Areas

I OBJECT. This policy is weak. The mitigation (cash compensation) offered for development in the special protection area is so small as to be meaningless.

SANG (Suitable Alternative Natural Greenspace) is not beneficial since the sites identified or targeted are already green space. This is just using agricultural or wooded land as recreation land in order to justify building on other green spaces nearby. There is no actual increase in open space or environmental protection; instead, it is a ploy designed to permit building on otherwise protected areas. SANG- in part used to prevent dogs and cats attacking nesting birds - must also ensure that it is not using land which is adjacent to the Special Protection Areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1728  Respondent: 15244641 / Wesley Raynbird-Tilbury  Agent:

POLICY S1 - Presumption in favour of sustainable development

I OBJECT. The NPPF states that the presumption in favour of sustainable development "should be seen as a golden thread running through both plan-making and decision-taking." 1 Standing at the head of the draft plan, Policy S1 ought to set a clear framework. Instead, no definition of "sustainable development" is given."2 The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The promise "to secure development that secures the economic, social and environmental conditions in the area" omits to recognise that economic growth, social justice and environmental protection often conflict. It does not say how each element is to be weighted or conflicts resolved. As a practical guide to the tough choices Councillors will face, it is useless. Under this policy, any development will qualify as "sustainable", thereby failing to apply the NPPF’s most important guideline.

The most gaping hole in Policy S1 is the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. It is the envy of the world. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The plan's contempt for Green Belt constraints is amply demonstrated in later policies.
The commitment to approve planning applications "wherever possible" and "without delay" reveals this draft plan's pro-development bias. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.3 In my view Policy S1 is a non-policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1729  Respondent: 15244641 / Wesley Raynbird-Tilbury  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY S2 - Borough Wide Strategy

I OBJECT . I have 5 objections to the proposal to build 13,860 new homes:

1. The number is based on pre-Brexit projections for economic and population growth, including migration . These now need to be revised downwards, possibly quite seriously.4

2. The number is based on an arbitrary Housing Market Area (HMA): the "West Surrey" tri-borough area of Guildford, Woking and Waverley . An HMA should be an area within which a majority of people live, work, shop or study . On any commonsense view, "West Surrey" is much too Half of Guildford borough's residents work elsewhere, and half the people who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside "West Surrey". Puzzlingly, the adjacent districts of Rushmoor and Mole Valley, minutes from Guildford town, are outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere. Unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and is part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council have failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make "West Surrey" reliable. The area is artificial, and so the housing numbers

"1 NPPF paragraph

"2 The most widely accepted definition is the 1987 United Nations one from the Brundtland Report: " Development that meets the needs of the resent without compromising the ability of future generations to meet their own needs."

"3 Including: " empowering local people to shape their surroundings ... Take account of the different roles and character of different areas... protecting the Green Belts around them ... recognizing the intrinsic character and beauty of the countryside and supporting thriving communities within it... Support the transition to a low carbon future ... Contribute to conserving and enhancing the natural environment and reducing pollution ... Encourage the effective use of land by reusing land that has previously been developed (brownfield land)... Conserve heritage assets ... Actively manage patterns
of growth to make the fullest use of public transport and cycling and focus significant development on locations which can be made sustainable."

"At the time of writing, about £8billion (40%) has been wiped off the value of the UK’s top 4 housebuilders alone.

derived from it are unreliable. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour's "need". Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county (none in Mole Valley, for instance). This highly lopsided distribution is unexplained.

1. The figure of 13,860 new homes is It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by commercial sub-contractor used in preparing the SHMA. The Council say we should trust the contractors' model because it is used by a large number of other local authorities. Wide usage, however, does not confer objectivity. Guildford's OAN would fail the basic transparency test even if the methodology used were a universally admired 'gold standard'. But it is not: it belongs to consultants whose website openly proclaim their pro-development agenda, provoking reasonable suspicion that the figures are inflated. External experts and members of the public have provided detailed critiques of the model. Its most fatal flaw, however, is that it has not been disclosed- not even to the authors of the plan, who have taken it on trust. This is irrational and unsound.

1. The status of the 13,860 figure is The plan fails to set a Housing Target of new homes to be built, or explain how this relates to the "Objectively Assessed Number" (OAN) for housing need. Elsewhere, the Council have said that the two are identical because the OAN is "deliverable" and is by definition objective and cannot be contradicted, but in the same breath say that infrastructure or other constraints may in due course affect deliverability. Despite the NPPF, the plan fails to address these constraints. In any case, the number of homes proposed, plus existing planning permission, plus expected "windfall" sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a "plan" that fails to propose a Housing Target that takes normal constraints and adjustments credibly into account, and which leaves the Council to set one at any level without further consultation. Even if the OAN were not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

1. It is irrational to embark on a radical transformation of the borough without a clear Housing Most of Guildford borough is theoretically protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the existing number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:
- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt increase tail backs on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/848  Respondent: 15244897 / Andrew Palmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/849  Respondent: 15244961 / N Byrnes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/850  Respondent: 15244961 / N Byrnes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/854  Respondent: 15245057 / Marian Homar  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPS16/855</th>
<th>Respondent: 15245217 / Kathryn SHORTMAN</th>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1765  Respondent: 15245313 / C.A. Lindsay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Economy

E6 Leisure and Visitor Experience

I object to the approach taken. We do not require buildings or extra attractions. We do need to value, appreciate and co-ordinate what we have.

I have a story to tell from last Spring - I met two tourists, stranded on Woodbridge Road, on the gyratory, in the rain, trying to get from the Railway Station to visit the Cathedral!

They had asked for and looked for directions all the way, without success – nobody knew. I accompanied them on a further, unpleasant trek to the Bus Station. There is not a bus to Guildford Cathedral.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1766  Respondent: 15245313 / C.A. Lindsay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
E7 Guildford Town Centre

I object to the concentration on more retail sites. They just are not needed.

It is a sad thing to walk around existing shopping areas and see the numbers of empty shops.

Let the town centre be a place for people to live. Please use the brownfield sites for housing: aiming for a convivial, thriving town.

It would be lovely to have some safe areas for small children in the town centre and more outdoor seating.

I fear we are heading for empty, anonymous concrete canyons for people to drive to sometimes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1762  Respondent: 15245313 / C.A. Lindsay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Housing

H1 Homes for all

I object here again, because, again, we understand that the assumptions have not been scrutinised or evaluated – surely this should be basic. Please debate these very basic things; it is what we expect our Councillors to do. The University should be making arrangements for its students – this would avoid the loss of so much accommodation which families desperately need and the escalating prices which are already unaffordable to many.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1763  Respondent: 15245313 / C.A. Lindsay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
H2 Affordable homes

I object to this supposed provision, because ‘affordable’ doesn’t really happen in Guildford. The policy for the provision of affordable homes should be taken seriously, strengthened and given much, much greater importance. We have a personal, family knowledge of this situation where a young family is living in unsuitable accommodation. Trying to cope in unsuitable accommodation puts a huge extra strain on the hard-working parents, who earn average salaries but still can not afford anything more, and even though they do their best to minimise the disadvantage to the children, it affects the children badly. This is what their lives will be founded upon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1764  Respondent: 15245313 / C.A. Lindsay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Protecting

P2 & P3 The Greenbelt and the Countryside The Greenbelt and the Countryside must be retained as “the greenbelt” and “the countryside”, not seen as optional, attractive development opportunities. If they are not safeguarded, we will never get them back, and we and future generations of Guildfordians will be the losers.

I object to what I believe is deference made to demands from business developers for easier, glamorous schemes and bigger profits: over what is actually in the best interests of residents and the environment – using brownfield and maximising the use of brownfield sites.

We have a particular interest in this issue also. Until 2015, Guildford Borough Council owned an empty piece of brownfield land, of over 1,000 square metres, near our home, in Christchurch ward. It had good access to two roads.

From 1975 when we first came to Guildford, we were told that it would be wanted for development. But in 2015 it was sold-off as garden-land, at £36 per square metre, and we have been unable to find-out the reason.

I do not know how many units of housing can be accommodated on 1,000 sq m.; it would be interesting to know this also. It appears to be a failure of duty by the Council.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3592  Respondent: 15245313 / C.A. Lindsay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
**Strategic**

S1 Presumption in favour of sustainable development

I don’t think it makes sense to give the Plan an overall presumption in favour of sustainable development. I object to this being primary and comprehensive. With many, many ideas, in many areas, there are not sufficient services, transport possibilities or other infrastructures in existence, or even possible or practicable. This must come first. It is already very, very difficult to move around in Guildford. It has a detrimental affect on the quality of life.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Answer (if comment is on questions 1-7 of the questionnaire): ()

S2 Borough wide strategy

It can not be right to base a Plan which is going to affect all of us so greatly on numbers and calculations which have not been substantiated or scrutinised. I object to this. They may be right? But why are they being kept hidden? It does not make sense. We have a right to know.

Also, shouldn’t expected numbers be rethought following the Referendum decision which most commentators are saying will make a huge difference?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<tr>
<th>Comment ID: PSLPP16/3591</th>
<th>Respondent: 15245313 / C.A. Lindsay</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Vision and ambition</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I have the following objections to the new Local Plan:

3) Our vision and ambition, Spatial Vision on p19 I strongly object to this statement. The language used is highly, highly positive, but the message is negative for Guildford. I do not believe that any of this is proven fact.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: pslp171/1992</th>
<th>Respondent: 15245313 / C.A. Lindsay</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>Land for Employment Use – E1, E2</th>
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<tbody>
<tr>
<td>Far too much potential development land within the town centre is being allocated for retail or commercial development rather than housing. I object to this.</td>
</tr>
<tr>
<td>It is not logical. It flies against national trends. It will make the terrible traffic and movement problems and the shortage of affordable housing worse.</td>
</tr>
<tr>
<td>The Burnt Common site is not suitable for heavy industry and it is in the Green Belt.</td>
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</tbody>
</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: pslp171/1989</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1</td>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

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<tr>
<th>Land Usage Density - H1/ H13</th>
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<tbody>
<tr>
<td>I object to the removal of this policy on land usage density. Please reinstate provision of the very important minimum and maximum land usage densities policy.</td>
</tr>
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</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
**Comment ID:** pslp171/1990  **Respondent:** 15245313 / C.A. Lindsay  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Areas of Outstanding National Beauty** – P1 and E5

The protection afforded to AONB’s appears to be weaker now as it does not have restrictions on non-major development. It is contrary to the huge responses from the public in previous consultations. I object to this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp171/1991  **Respondent:** 15245313 / C.A. Lindsay  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**The Green Belt** – P2, P3, E5 and specific sites

Here again the changes do not show responsiveness to the weight of public opinion which is heavily against weakening these policies. I object to this. No attempt is made to demonstrate exceptional circumstances feeding in to figures quoted.

Also, the Rural Economic Strategy which is covered in 4.51a quotes as a main aim promoting affordable homes everywhere in the countryside including AONB. It could work as a mechanism to produce overdevelopment in the countryside. I object to this and it has not been subjected to full public consultation.

The three major strategic sites of Blackwell Farm, Wisley Airfield and Gosden Hill Farm are in the Green Belt. I object to them still being put forward.

Previous consultations show that in line with the NPPF the public prefer the use of brownfield land in the urban area first for housing.
We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:
- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt increase tail backs on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

I OBJECT TO the lack of immediate provision for new schools.
I OBJECT TO the lack of immediate provision for doctors surgeries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<tr>
<th>Comment ID: PSLPS16/862</th>
<th>Respondent: 15245697 / Justine Butler</th>
<th>Agent:</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I OBJECT TO site A35 land at Former Wisley airfield.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A36</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I OBJECT TO site A36 hotel plot in East Horsley.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A37</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I OBJECT TO site A37 land near Bell &amp; Colvill, East Horsley.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I OBJECT TO site A38 land to west of West Horsley.</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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<tr>
<td>I OBJECT TO site A39 land near Horsley railway station.</td>
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<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<th>Comment ID: PSLPS16/868  Respondent: 15245697 / Justine Butler  Agent:</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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<tr>
<td>I OBJECT TO site A40 land to north of West Horsley.</td>
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<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Attached documents:</td>
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<th>Comment ID: PSLPS16/869  Respondent: 15245697 / Justine Butler  Agent:</th>
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<tr>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A41</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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<tr>
<td>I OBJECT TO site A41 land to south of West Horsley.</td>
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<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Attached documents:</td>
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| Comment ID: PSLPS16/858  Respondent: 15245697 / Justine Butler  Agent:  |
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO site A43 Garlicks Arch.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/859  Respondent: 15245697 / Justine Butler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO site A43a the on and off ramp at Clandon - this will increase traffic problems in the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/860  Respondent: 15245697 / Justine Butler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO site A45 the Talbot - this is overdevelopment in a conservation area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/861  Respondent: 15245697 / Justine Butler  Agent:
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
| I OBJECT TO site A57 the Paddocks - this is unlawful. |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |
| **Comment ID:** PSLPP16/1769  **Respondent:** 15245697 / Justine Butler  **Agent:** |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
| I OBJECT TO the additional pressure on existing roads and facilities. |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |
| **Comment ID:** PSLPP16/1767  **Respondent:** 15245697 / Justine Butler  **Agent:** |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
| I am writing to lodge my objections to the Guildford Borough Council Draft Local Plan. Specifically: I OBJECT TO all erosion of the Green Belt. I OBJECT TO any "in setting" (ie removal) of any villages from the Green Belt. |
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1768  Respondent: 15245697 / Justine Butler  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO the disproportionate amount of development in one area of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/374  Respondent: 15245697 / Justine Butler  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO the limited consultation period.

I OBJECT TO the last minute inclusion of new sites with less than 2 weeks notice.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/877  Respondent: 15245921 / Rachel Cunningham  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Page 380 of 2804
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- **Statement of objection.**
  - **Object** to the large scale ‘strategic’ development proposed at Policy A46 which I consider to be inappropriate development.
  - The Local Plan does not demonstrate any ‘exceptional circumstances’ that warrant Normandy’s removal from the Green Belt.

- **Need for a secondary school in Normandy.**
  - I question the need for a secondary school to be placed specifically in Normandy. I have not seen any evidence, either from GBC or SCC that supports this requirement.
  - I understand from my county councillor (Cllr K Witham) that there is an abundance of pupil places available at other secondary schools in the area to the west of Guildford. Some of these schools also have capacity to expand in the future. Why has this not been fully considered as part of the Local Plan?
  - If a further school is required, it could equally be built elsewhere within the borough. Normandy secondary school pupils already commute by train to schools in Guildford.
  - With no requirement for a school in Normandy there is no requirement for 1100 homes.

- **Access to Site A46.**
  - I am concerned that the two lanes (Glaziers Lane and Westwood Lane) that will provide access routes into the development are not fit for purpose. They are narrow, with bridge and tunnel restrictions. By their nature, the Lanes offer little opportunity for improvement in order to provide safe transit of vehicles and pedestrians alike, this is particularly so with what will be a significant increase in traffic.

- **Traveller and show people plots.**
  - Normandy already has a high percentage of sites within its parish compared with others across the borough. **Policy A49** seeks to grant permanent permission to a site that has had temporary retrospective planning permission since 2009. Why is it proposed to increase the number of these sites still further in Normandy when other parishes could share the responsibility?

- **Increased provision for GPs and Dental surgeries in Normandy (Appendix C - HSC).**
  - Residents of Normandy are currently served by The Fairlands medical practice for GP and dental services, with a small surgery and pharmacy outlet in Normandy.
  - To gain an appointment to see a doctor of choice in Normandy currently takes in excess of 2 weeks.
  - As proposed, the development would double the size of the village and have the consequence of placing considerable extra burden on an already stretched facility. Why therefore has no consideration been given to enlarging this medical provision under **Appendix C – HSC**?

- **Environment.**
  - I am very concerned at the impact that a proposed development of this size would have on the local environment for flora and fauna. There is no evidence in the Local Plan of acceptance or mitigation of what permanent effect this proposed development would have. The proposed development is within close proximity to the Thames Basin Heaths Special Protection Area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

I am writing to protest against the local plan proposals and in particular the proposed developments in West Horsley.

I must make it clear that I accept there is a need for further housing and that there should be some development in West Horsley but what is proposed is not only disproportionate but would have the inevitable effect of ruining a village and causing irreparable damage to the Green Belt.

West Horsley has a rich and varied mix of well established low housing density settlements with a considerable number of historic buildings. It is a pretty village which receives a considerable number of recreational visitors through the seasons each year who are undoubtedly attracted by its setting in a rural environment.

It is of note that the Key Evidence document 'Guildford Borough Economic Strategy 2013-2031 makes no case for locating large numbers of homes in West and East Horsley or neighbouring villages.

The sites proposed cannot be considered individually but must be considered for their cumulative impact on the area.

Building 385 new houses on these 4 sites, plus at least another 50 on small sites will destroy the rural character of this community.

I fail to understand why West Horsley in particular has been singled out to increase in size by 35% when the rest of the borough will increase by a far lower percentage and in particular Guildford town is scheduled to have an increase in size of only 11%.

A development of this size will put unsustainable strain on local facilities and infrastructure, including public transport, parking, schooling, medical facilities, sewage, surface drainage and shops.

There are as far as I am aware no plans whatsoever to provide the necessary schools to cope with such an increase in population.

The Raleigh School is already full and the private Glenesk and Cranmore schools are also at or near to full capacity. The suggestion that schools in Ripley can be used contradicts the plan’s stated intention to reduce traffic on the A3 and the strategic aim that primary schools should be within walking distance.
The secondary school situation is already critical. The Howard of Effingham is well oversubscribed and is struggling to cope on a site which it outgrew many years ago there seems to be no proposal from Surrey County Council to cope with the present situation let alone that which would arise if these plans were to go ahead.

There are other reasons why the proposed village expansion is unsustainable. With only one small shop which is due to close in September, no post office, a very limited weekdays only bus service through the village, there is no infrastructure which could begin to support the proposed high volumes of new housing development.

The development of 385 homes on the 4 proposed sites are at much higher densities than currently exist in the village settlement and will be totally out of character with the existing mix of different housing styles and layout of the village.

An increase in village population will increase pressure on station parking and traffic movements to and from Horsley station and an increase in school children going to Guildford and Leatherhead.

The volume of traffic generated from the proposed new housing estates will be considerable and the impact on the local roads, which already struggle to cope with adverse weather conditions, will be significant.

Kingston Avenue Medical Centre which serves all of East and West Horsley and surrounding areas is already extremely busy and residents experience difficulty in making appointments.

For all these reasons I implore you to agree that the need for so many houses to be built in West Horsley is totally unproven and unrealistic.

**GREEN BELT**

The first line of Policy P2 states, “We will continue to protect the Metropolitan Green Belt against inappropriate development.”

A survey of the residents of West Horsley conducted in 2015 showed that they are totally opposed to the village's removal from the Green Belt by insetting and extending the 2003 Local Plan Settlement Area boundaries.

I of course accept that their views cannot dictate planning policy, but such a strength of feeling should surely only be ignored if there is cogent evidence to justify it.
No exceptional circumstances or other justification is made for the new Green Belt boundaries that will result from the proposed insetting of West and East Horsley from the Metropolitan Green Belt.

West Horsley's defined Settlement Area boundaries (ref 2003 Local Plan) do not need to be extended and should not be.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/599  Respondent: 15246497 / G F Bennett  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of immediate provision for new schools
I object to the lack of any immediate provision for doctors surgeries

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/598  Respondent: 15246497 / G F Bennett  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of any evidence for the alleged housing need numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/878  Respondent: 15246497 / G F Bennett  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The plan is to build 400 new homes under a revised local plan. This would surely cause havoc.

I also object to the lack of evidence for the provision of new schools, doctors surgeries, not to mention drainage/sewage facilities and public transport. Chaos would be caused by traffic. In this day and age the norm has become for most houses to have 2 or 3 cars. The mind boggles at the number of cars on these local roads at any one time, especially in rush hour.

I object also to the short amount of notice given to the inhabitants of the above mentioned villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/879  Respondent: 15246497 / G F Bennett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It is also proposed to build a new 4 way on/off ramp to the A3 at Burnt Common. How is this supposed to answer the problems caused by hundreds of extra cars, vans and trucks passing through and converging on Send, Ripley and Clandon?

Losing the green belt would be a huge loss of history and amenities in an attractive and much loved area.

Please think again.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/882  Respondent: 15246497 / G F Bennett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the new 4 way on/off ramp to A3 at Burnt Common. It is bad enough now, further traffic would cause grid lock and so much more pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1817  Respondent: 15246497 / G F Bennett  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object very strongly over waste water and sewage. The system already is overflooded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1792  Respondent: 15246497 / G F Bennett  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object to the 2016 Draft Local Plan.

I object to Ripley, Send and Clandon being removed from the Green Belt, which I believe is called 'in-setting'.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1819  Respondent: 15246497 / G F Bennett  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to however, you can consider taking away the green belt land, to build what sounds like, you want to build a china town when you could use plenty of brown land.

How can anyone agree with such plans? Ridiculous.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1795  Respondent: 15246497 / G F Bennett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the amount of development, in one area of the Borough, you so called planners, obviously do not live in these areas. Perhaps it would all be different if you did?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/376  Respondent: 15246497 / G F Bennett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the limited consultation period

I object to the last minute inclusion of new sites with less than 2 weeks notice

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the proposed development outlined for A46. It is a disproportionately large development which will change the nature of the village of Normandy forever. There has not been enough consultation with local people on this matter. I feel that Guildford Borough Council has decided to push a large proportion of proposed new housing into Normandy/Flexford rather than looking at other sites, especially brownfield ones. The green belt should remain as it is. It should be sacrosanct and not tinkered with. There are no clear or special circumstances by which it is necessary to build upon the green belt. Although other areas of housing have been identified across the borough, the largest proportion allocated close to existing communities is here in Normandy. This is unfair and the rest of the borough should bear the burden more equally - if indeed so many extra houses are really needed (see my comment below).

There is also real concern about the impact on infrastructure that the proposed development will have. Traffic is already very bad during busy periods, and the small roads in the local area cannot support further traffic. Pollution from road traffic will also affect the local population and local wildlife.

The noise, dust and road traffic problems caused during a protracted period of building in this area will also affect families who are trying to get on with normal lives in a currently very peaceful area.

I question the accuracy of statistics that state that the population of Guildford will grow to the extent that the number of homes suggested here and across the rest of the local plan will be needed. The numbers of short-term visitors, especially university students have skewed the statistics and are giving false indications as to how many extra homes are really required.

The inclusion of many new traveller pitches in the proposed site is also a concern. The fact that there are already a number of traveller sites in the Normandy area does not mean that more should be added. These allocations are not being spread evenly across the borough. This proposal risks pigeonholing our area the borough as specifically traveller-heavy areas and this is not acceptable.

Ours is a beautiful and semi-rural community. It should not be overwhelmed by a housing development that is too large and does not have the support of the local community, myself included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICIES A37, A38, A40 & A41, located in West Horsley

The LAA identifies six sites in West Horsley for potential development, the four largest having allocation policies within the Proposed Submission Local Plan. The total housing number arising from these six sites is 405 homes in total. For a village which had 1,124 dwellings at the 2011 Census, this represents a proportional increase of 36% over the plan period, an enormously high proportion by any standards.

The four policy sites are all located within the Green Belt. One is a partly brownfield development but the other three sites are all open fields used for agriculture and all lie within the current Green Belt at the edge of the Settlement Area. The reasons presented by the consultants, Pegasus, in the Green Belt & Countryside Study to justify these settlement boundary movements appear to us highly questionable and in no way to meet the requirements of the NPPF that such boundary movements are only to be made in ‘exceptional circumstances’. These movements clearly represent a deliberate pushing back of settlement boundaries in order to provide more greenfield sites for housing development. As such, I consider these proposed movements in settlement boundaries to be invalid.

These proposals are also contrary to the principles of the Metropolitan Green Belt. West Horsley represents one of the first ‘lines of defence’ against London urban encroachment outside of the M25 circle. Yet these policies will eliminate a significant part of this defence as they seek to expand the boundaries of this village and fill-in every bit of green space within this rural setting.

It is also totally contrary to the opening statement of Local Plan Policy P2 that “We will continue to protect the Metropolitan Green Belt” It seems that in West and East Horsley at least the draft Local Plan is doing exactly the opposite.

Given the scale of the development proposed in West Horsley, the inevitable destruction of its village character and the impact on infrastructure across West and East Horsley, I OBJECT to the site allocation policies A37, A38, A40 and A41.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPS16/886</th>
<th>Respondent:</th>
<th>15247265 / Aileen Aitcheson</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
<td></td>
<td></td>
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</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY A35: Land at former Wisley Airfield

Policy A35 proposes approximately 2,000 homes to be built on the site of the former Wisley Airfield. This will lead to the creation of the largest settlement in Guildford Borough outside of Guildford town. In effect it is proposing to create a New Town in the heart of the Surrey Green Belt.

I have major concerns about this proposed development and have objected against prior planning applications at this location. I consider this proposed development to be a severe contravention of Metropolitan Green Belt policy. It will result in a New Town being created of very low sustainability which will have a major adverse impact on infrastructure across a widespread area, including East Horsley. Above all it will cause irreversible destruction to the character of one of the most picturesque and historic areas of the country.
I strongly OBJECT to this proposed policy for the reasons below.

1. **a) The proposed development represents a fundamental breach of Metropolitan Green Belt rules:**

The site forms part of the Metropolitan Green Belt. Under the NPPF, development on such Green Belt land is only permitted under ‘very special circumstances’. GBC’s Planning Officer, in assessing a previous planning application from the developer of this site, rejected their application, arguing that: *It has not been demonstrated that the benefits of the proposal amount to very special circumstances such as to clearly outweigh the harm to the Green Belt and the other harm identified.*

Ministerial guidance has repeatedly confirmed that unfulfilled housing need does not qualify as a very special circumstance. Whilst the developers’ previous planning application was judged and rejected based upon the 2003 GBC Local Plan, the proposal to include this site within the 2016 Proposed Submission Local Plan does not fundamentally change the argument against it. Any removal of this site from the Green Belt can only be made based upon ‘exceptional circumstances’, which cannot be justified on the basis of unfulfilled housing need. If this was the case, then the entire Metropolitan Green Belt would already have become filled with housing.

Removal of this site from the Green Belt is totally against its rules, regulations and underlying spirit. The site location at the edge of the M25 circle represents a ‘first line of defence’ against metropolitan encroachment into the Surrey countryside. If this site is developed then it becomes only a question of time before Guildford itself is absorbed into the sprawling London conurbation.

*Accordingly, I OBJECT to Policy A35 as a fundamental breach of the Metropolitan Green Belt rules.*

1. **b) This site does not meet acceptable levels of sustainability:**

Sustainability Appraisal is a core concept of planning policy, yet this site is rated very poorly in terms of its sustainability.

The sustainability appraisal undertaken by GBC’s consultant, AECOM, is presented in the Local Plan Evidence Base report ‘Sustainability Appraisal (SA) of the Guildford Borough Local Plan’ issued in June 2016. In their report AECOM have graded all Local Plan policy sites according to 21 different criteria using the conventional ‘traffic light’ system. Red colouring signifies poor sustainability. Of the six larger sites included in their evaluation, (those with proposed housing numbers of 1000 homes or greater), AECOM rates Site A35 as the very worst of all in terms of its sustainability. No less than 8 out of the 21 criteria are graded as ‘Red’ by AECOM for this site, more than any other large site.

Detailed reasons why this site has such poor sustainability include the following:

- There is currently no infrastructure whatsoever at this site, meaning that all water, electricity, gas and phone services will need to be newly established;

- New large-scale sewage disposal will be needed, a fact recognised by Thames Water, indicating it may take 3+ years to provide adequate sewage handling facilities for this site;

- There are presently no schools, medical services or shops within walking distance of this site;

- There is presently no local employment at this site and little after the development is completed;
• There will be a significant destruction of agricultural land arising from this development;

• There will be significant environmental damage from this development;

• There is no public transport currently serving this location;

• The nearest train stations are Horsley and Effingham Junction, both around 3 miles away and so too far to walk. Neither station currently has significant parking capacity available.

• Travel from this site will be primarily dependent upon motor vehicles. Any new site so dependent upon motor vehicles for transport cannot be considered as being ‘sustainable’;

• New access roads will be needed and significant changes proposed to the surrounding road network, leading to further pressure on over-crowded rural roads and increase in the traffic congestion in nearby settlements;

Whilst some of these issues may be mitigated, e.g. by building new schools, medical facilities, etc, others such as the environmental issues and infrastructure impact may not. This proposal, fundamentally, represents an attempt to create a large-scale new settlement in a poorly-sited green field location. However, as the GBC’s own consultant has demonstrated, this site does not reach acceptable minimum levels of sustainability.

Accordingly, I OBJECT to Policy A35 on grounds of its unacceptable sustainability.

1. c) The site will have a severe impact on local traffic & infrastructure:

The proposed development will have a severe adverse impact on road traffic in the surrounding area. This includes East Horsley where high volumes of additional traffic are likely from the residents of this new settlement accessing East Horsley’s two stations, shops and nearby schools. Most of the rural roads in this area are narrow winding ‘lanes’ – a term used in a recent local public meeting by John Furey, senior SCC councillor for Infrastructure to describe East Horsley’s through roads. Many of these ‘lanes’ are without pavements for large stretches, whilst the principal through-roads of Ockham Road South and Forest Road pass along unlit residential areas so narrow that two buses cannot cross in many sections of these ‘lanes’.

The road closures and junction changes being proposed to accompany this development will only serve to increase traffic volumes through the village centres of East Horsley, Cobham and Ripley, and around the station at Effingham Junction, all of which already suffer from traffic congestion at peak hours. The further increase in traffic congestion at the A3-M25 intersection would only exacerbate an existing problem for the highways authority - we understand Highways England have repeatedly expressed serious concerns about this development.

Neither Horsley nor Effingham Junction railway stations currently have any significant spare parking capacity. The suggestion of the developer that large numbers of cyclists from Site A35 will cycle 6 or 7 miles each day along busy roads in order to travel there and back to these stations lacks credibility. Other village facilities in East Horsley, such as the medical centre, are also likely to suffer adversely from a substantial increase in users as a result of this proposed development.

Accordingly, I OBJECT to Policy A35 on grounds of its severe impact on local infrastructure.

1. d) There are damaging health & safety implications arising from development at this site:
The site is located close to the junction of the M25 and A3, one of the busiest road junctions in the country. The Nitrous Oxide (‘NOx’) emissions recorded around this area are extremely high and will affect residents living at the proposed site. The proposal to build new primary and secondary schools at this location is also contrary to government policy prohibiting the building of schools on sites in areas where there is high NOx.

In rejecting the previous planning application by the developers, the GBC Planning Officer cited the “failure to provide adequate information on NOx emissions and nitrogen deposition and to provide any information on acid deposition” as one of the grounds for this rejection.

Accordingly, I OBJECT to Policy A35 on grounds of its adverse health & safety implications

1. e) The environmental impact on protected wildlife will be substantial:

GBC’s Land Availability Assessment which supports Policy A35 states that the site lies within the 400m-5km ‘Zone of Influence’ of the Thames Basin Heaths Special Protection Area (‘SPA’). This is not correct. The site is immediately adjacent to Ockham & Wisley Commons, an area designated as a Site of Special Scientific Importance (‘SSSI’), which forms one part of the Thames Basin Heaths SPA and much of the site lies within the 400m Exclusion Zone where new building is effectively prohibited.

The SPA was set up to provide protection for rare and threatened birdlife in certain lowland heath locations, the provisions of which were agreed by GBC in its ‘Thames Basin Heaths SPA Avoidance Strategy’.

This strategy establishes zones to protect the SPA from the impact of new development, particularly from the damage caused by pets (dogs, cats, etc) of local residents to the habitats of threatened ground-nesting birds. Land within 400m of the SPA is designated as an ‘Exclusion Zone’ where “there will be a presumption against additional new dwellings”. Since the Wisley Airfield site is immediately adjacent to Ockham Common for a significant length, much of this site falls within 400m of the SPA Exclusion Zone.

The remaining portion of this site falls within the 400m - 5km ‘Zone of Influence’ set out under the SPA policy, which requires developers to contribute a new SANG (‘Site of Alternative Natural Greenspace’) to mitigate for potential damage caused to the SPA from new development – the size of the SANG is a function of the scale of the development. In their previous planning application the developers proposed that the land within the 400m Exclusion Zone would provide their SANG contribution. If accepted as a SANG, this would only encourage the 5000+ residents of the new settlement to allow their pets access into this space, therefore defeating the objective of the SANG mitigation.

Even with the 400m Exclusion Zone in effect, the positioning of such a large site immediately adjacent to such an important protected space will inevitably have a major detrimental impact on the wildlife within it.

Accordingly, I OBJECT to Policy A35 on grounds of its material adverse environmental impact.

The impact of the Exclusion Zone and SANG requirements, together with the need to provide for the existing waste facility, means that the actual area of land available for housing development at this site is estimated to be around 43 hectares.

1. f) The development is totally out of keeping with local character, context & distinctiveness:

It is a key element of planning policy that new developments should be in keeping with the established pattern of development in the area. In the 2016 Proposed Submission Local Plan, GBC’s very first housing policy, Policy H1, requires that development should: “make the most efficient use of land whilst responding to local character, context and distinctiveness.” However, Policy A35 fails to do this.
With its proposal to build some 2,100 homes on and around the site of the former Wisley Airfield, Policy A35 will create a new settlement larger than any other in Guildford Borough, outside of Guildford itself. The nearby historic village of Ockham has merely 159 dwellings. It will be completely swamped by a development on such a scale.

Moreover, the design and density of the proposed development will be completely out of context with its surrounding area. Due to the restrictions of the SPA Exclusion Zone, the need for SANG provision and the land needed for the waste facility, the actual land area to be used for housing development under Policy A35 is estimated to be around 43 hectares. Therefore, with 2,100 homes proposed for this site, the overall housing density of the settlement area may be calculated at around 49 dwellings per hectare (‘dph’).

East Horsley, just three miles from this site, is the largest settlement in Guildford borough outside of Guildford town, with some 1,760 homes. East Horsley presently has an overall housing density of 8.1 dph within its settlement area. Therefore, the proposed development under Policy A35 is six times as dense as the nearest settlement of a comparable size. The proposed development under Policy A35 therefore utterly fails to respond to local context and as such is in breach of GBC’s own Housing Policy H1.

The density of 49 dph proposed under Policy A35 is effectively an urban density appropriate for a metropolitan location. It is to be achieved in part by building apartment blocks of five stories in height, according to the designs previously presented by the developer. For a setting within the middle of rural Surrey this is completely out of character.

Other settlements close to this site are small rural villages such as Ockham, West Horsley and Ripley. These villages have grown up organically over a thousand years. They contain many historic, listed or otherwise protected buildings as well as a range of residential housing, predominantly detached two-storey houses or bungalows. They are all picturesque villages with charm and character. Visitors come to the area to enjoy some of the prettiest villages and countryside in southern England, all within easy access of London. The character of this whole area would be irreparably destroyed if this development goes ahead.

Accordingly, I OBJECT to Policy A35 on the grounds that it is out of keeping with local character, context and distinctiveness, and therefore breaches the NPPF and emerging GBC Policy H1.

Concluding remarks

I do not share the same vision for the future of Guildford Borough as GBC, although I do recognise that an enormous volume of work has gone into the preparation of the Proposed Submission Local Plan, which is now out for public consultation.

However, after more than 20,000 responses were submitted in 2014 in connection with the previous draft Local Plan, most of them opposed to its proposals, GBC has made relatively few changes from the earlier version and none of any materiality.

At the heart of the problem is GBC’s desire to pursue a ‘Forced Growth’ policy which results in highly aggressive and unjustified targets being set for housing development in the Borough. These excessive targets – the proposed 25% increase in housing stock in particular – create a tremendous strain on both land and infrastructure in an already over-crowded and over-stretched part of the country.

These targets will also have a material adverse impact on the Metropolitan Green Belt across this area, despite all the political promises made to the contrary. The irony of Policy P2 which states that ‘We will continue to protect the Metropolitan Green Belt’ does not fool anybody.

Accordingly I OBJECT to the Proposed Submission Local Plan.

I sincerely request that GBC that radically re-assess its own policy objectives rather than force through the Council a Local Plan which clearly does not have the wider support of the residents of Guildford Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

### 1. SITES POLICIES

Of the many sites policies set out in the Proposed Submission Local Plan, I comment upon those in East Horsley as well as several in the surrounding area which may affect the village.

Five East Horsley sites are identified in GBC’s Land Availability Assessment (‘LAA’), two of which are allocated under policies in the Proposed Submission Local Plan. The adjacent parish of West Horsley has six sites identified in the LAA, four of which are allocated in the Proposed Submission Local Plan. Our comments on these site policies are as follows:

**POLICY A36: Hotel, Guildford Road**

Policy A36 proposes to re-develop the current Thatcher’s Hotel for housing.

I am concerned about the loss of this long-standing village hotel and significant employer. However, assuming that the employment loss can be justified, (which is a condition of Policy A36), then I am broadly supportive of housing development at this location, providing it is done in a manner that is in keeping with its prominent landmark position at the entrance to the village. The site is also close to the East Horsley Conservation Area and housing designs and site configuration must reflect the sensitivity of this setting.

Whilst I endorse many of the requirements set out in Policy A36, my principal concern is over the number of houses proposed for this site - approximately 48 dwellings. This number gives an implied gross housing density of 37 dwellings per hectare, which is exceptionally high for this location. The average housing density across the East Horsley Settlement Area is 8.1 dwellings per hectare and the highest density found in any of the roads around this location is 13 dwellings per hectare.

I would only support development at this location if it has a significantly lower housing density.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attachments:
POLICY A39: Land behind Ockham Road North, near Horsley railway station

Policy A39 proposes a housing development of some 100 dwellings on a 5.7 acre green-field Green Belt site behind the houses on the western side of Ockham Road North. Access is to be secured by demolishing the first two houses next to the railway bridge.

As discussed earlier, I consider that the proposed western movement of the settlement boundary needed to bring this site within the settlement area is unjustified and contrary to NPPF rules. If this boundary movement is invalid, as I believe, then this site remains a part of the Metropolitan Green Belt. As such and with no ‘very special circumstances’ to justify housing development upon it, I OBJECT to Policy A39.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1. DESIGN POLICIES

This section sets out the basis for a number of design policies relating to proposed developments in the Borough.

POLICY D1: Making better places

I support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY D2: Sustainable design, construction & energy

I support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1813  Respondent: 15247265 / Aileen Aitcheson  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY D3: Historic environment

East Horsley contains a wide range of heritage assets which make an important contribution to the look and feel of the village and its character. I fully support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1814  Respondent: 15247265 / Aileen Aitcheson  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY D4: Development in urban areas and inset villages

We support this design policy, although not the proposal of Policy P2 to inset East Horsley from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. ECONOMY POLICIES

POLICY E1: Sustainable employment

I support the general policy statements made in this policy, whilst having no opinion on the scale of the new office space and industrial land area being proposed by GBC.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E2: Location for new employment floorspace

Under this policy, areas within 500 meters of a "public transport interchange" play a key role.

Proposals for new office and research and development floorspace are to be directed to firstly Guildford town centre and then to areas within 500 meters of a public transport interchange ("PTI").

East Horsley has two railway stations, Horsley Station and Effingham Junction Station, but currently the draft Local Plan only proposes that Horsley Station should have PTI status.

The explanation given at 4.4.17 for Effingham Junction Station ("EJS") not enjoying this status is that either it is located within the Green Belt, or it is within an AONB or it is isolated away from the village or centre. It is not clear which of these applies to this particular station, but we believe strongly that none apply and that there is a strong case for EJS deserving PTI status in the same way as Horsley Station.

I will deal firstly with the three alternative reasons given for EJS not supposedly qualifying as a PTI.

Firstly there is the Green Belt aspect. This is not logical since if location within the Green Belt were determinative, this would mean that Horsley Station would also fail to gain PTI status.

Also the draft Local Plan proposes elsewhere at Policy P2 that the whole of East Horsley, including both Horsley Station and EJS, should be inset from the Green Belt. It will be seen elsewhere in these comments that I object strongly to this
proposal, but the point remains that if location within the Green Belt were a valid reason for not being given PTI status, the Local Plan itself makes it clear that under Policy P2 this will not apply in the case of both Horsley Station and EJS.

Secondly EJS is not located in an AONB. EJS is within the envelope of the village settlement and will remain as such under the draft Local Plan.

Thirdly EJS is not "isolated" or "away from the village centre."

Effingham Junction (the area immediately south and west of EJS, served by respectively Forest Road south of the railway bridge and Old Lane) may not have the extensive shopping parades enjoyed by East Horsley's two other centres (Station Parade and Bishopsmead Parade) but it is a thriving community with a significant population and also a significant number of active and successful employment floorspaces and sites.

These include in Forest Road a general store (Forest Road General Store), a car sales and car repair business (PJB Car Sales/The Body Shop), a dental health centre and chiropractic clinic (Mortiboys) and on Horsley Road, Cedar Garden Centre, Royce Turf and Irrigation and at the Newmarsh Farm site, a number of businesses including Richmonds Horse Transport, Braye Hydraulic Repairs and TTS Surfacing Ltd.

It is therefore vital that the Local Plan's economy policies affecting the area protect these spaces and sites and create conditions for their sustainable growth and hence job creation.

Since all or most of these businesses are located within 500 meters of EJS, Policy E2 would be an invaluable driver for such growth which could play a major role in ensuring that Effingham Junction maintained and enhanced its position as East Horsley's "third centre" for homes and jobs. On the other hand, to exclude EJS from PTI status could very well stifle its sustainable development and condemn it to a future as a dormitory "backwater" of East Horsley.

It is also counter-intuitive in the extreme to refuse EJS "PTI" status. This is for the simple reason that EJS is clearly a "public transport interchange" as that term would be normally understood. This is for the following reasons:

1. As the name "Effingham Junction" indicates, EJS is at an important junction and interchange. The railway line from Guildford splits here into two lines which take different routes into London, so many London-bound passengers will change trains here;
2. EJS serves not only the Effingham Junction area, but also the many residents of Effingham and Little Bookham for whom EJS is far closer than Bookham Station;
3. EJS also serves the many residents of the Cobham area for whom EJS is far closer than Cobham and Stoke d'Abernon station EJS also serves the residents of Ockham and Ripley;
4. EJS also serves the considerable numbers who visit local leisure activity sites, including three paintball sites and two clay pigeon shooting sites, for whom EJS is the only viable public transport hub; and
5. EJS will be the nearest railway station to the land at the former Wisley Airfield site which is proposed for the building of 2000 homes under Policy A35 of the draft Local Plan and if, despite the objections of many including East Horsley Parish Council, this proceeds, then significant numbers of residents will be taking one form of travel to EJS and then interchanging onto the railway.

I accordingly OBJECT to Policy E2 insofar as it fails to confer "public transport interchange" status on Effingham Junction Station.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**POLICIES E3 to E7:**

I have no comments on these policies.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>PSLPP16/1809</th>
<th>Respondent: 15247265 / Aileen Aitcheson</th>
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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy E8</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**POLICY E8: District centres**

I support this policy, including the designation of Station Parade, East Horsley, as a District Centre under the draft Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID:</th>
<th>PSLPP16/1810</th>
<th>Respondent: 15247265 / Aileen Aitcheson</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**POLICY E9: Local centres**

I support this policy, including the designation of Bishopsmead Parade, East Horsley, as a rural Local Centre under the draft Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. HOUSING POLICIES

This section provides comments on the housing policies set out in the Proposed Submission Local Plan.

POLICY H1: Homes for all

I support the general policy statements made in this policy, which are mostly repeating NPPF polices. My main concerns, as set out previously, are primarily with the scale of new housing being proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

POLICY H2: Affordable Homes

I support the general principle that developers should be required to contribute part of their development profit towards the cost of social housing in the borough. However, this ‘one-size-fits-all’ policy is seriously flawed and likely to prove highly inefficient, if not unworkable, in the longer term.

In this policy GBC have taken no regard whatsoever of the differences in affordable housing need across the borough. This has significant consequences in East Horsley, which is the area with the lowest demand for affordable housing in the borough. Moreover, East Horsley is not classified as a ‘rural area’ under the 1997 Housing Order and therefore is not exempt from the new ‘right to acquire or enfranchise’ entitlement – a factor which is likely to see affordable houses in the parish being bought up as soon as possible and thereafter lost to the affordable sector.
Under Policy H2, 40% of all but the smallest development sites in East Horsley will be required to have affordable housing built upon them, irrespective of whether there is actually demand for more social housing in that area. Moreover, the affordable housing targets proposed in the Proposed Submission Local Plan indicate that the biggest component of affordable housing (40%) should be built as 1-bed dwellings despite the fact that GBC’s own studies show that the strongest affordable demand in the borough is actually for larger 3-bed dwellings.

As a result of this flawed affordable housing policy, a significant volume of social housing is likely to be built in places where it is not needed and offered to tenants who do not want to live there nor have jobs near that location.

Policy H2 thereby fails the test of sustainability and should be radically revised. If not, the outcome will be serious inefficiency in the provision of social housing in the borough. In an area such as East Horsley this is likely to be manifested in a rapid buying-up of properties for quick re-sale at a generous profit, at which point these homes also become lost to the affordable sector.

I accordingly OBJECT to Policy H2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1800  Respondent: 15247265 / Aileen Aitcheson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H3: Rural exception homes

I support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1815  Respondent: 15247265 / Aileen Aitcheson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. INFRASTRUCTURE POLICIES

This section of the Proposed Submission Local Plan sets out details covering a range of infrastructure policies.

POLICIES I1, I2 & I3

These three policies cover Infrastructure & Delivery, Supporting the Department of Transport’s ‘Road Investment Strategy’ and Sustainable Transport. Whilst I support the general policy statements as presented in each case, it is the detailed infrastructure proposals for Guildford Borough which give me cause for concern.

I believe there are serious deficiencies and shortcomings in the infrastructure of Guildford Borough as it is today and that the aggressive housing policy as proposed by GBC in the Proposed Submission Local Plan will exacerbate this problem.

I would make the following comments specifically about infrastructure in East Horsley today:

- Roads across the parish are in poor condition with many potholes. Many roads are unable to sustain their current levels of traffic, particularly the increasing levels of HGV traffic;
- The principal through roads traversing East Horsley are narrow and winding, have a series of pinch points, have sections without any pavements and are generally unlit. As a senior SCC councillor remarked at a recent public meeting in the village hall: “East Horsley has lanes, not roads.” East Horsley’s ‘lanes’ are totally unsuitable for high volumes of traffic, in particular for the volume of HGV’s now using them;
- Many of the drains are blocked or otherwise in poor condition giving rise to frequent surface water flooding when it rains;
- The pavements are in poor condition. As well as being narrow, they are often uneven and/or cracked making it difficult, for example, for people with pushchairs or prams or in wheelchairs;
- There are insufficient school spaces for the number of local children needing them, with the result that children are often allocated to schools a significant distance away such as Dorking or Woking; and
- The Medical Centre in East Horsley is already at capacity in terms of its number of patients.

It is recognised that, as stated in the Proposed Submission Local Plan, the maintenance of adequate infrastructure and its expansion to meet growing needs is the responsibility of the relevant infrastructure provider. This is often not GBC itself but rather, for example, Surrey County Council or utility companies.

In respect of East Horsley, there are only two specific proposals in Appendix C:

LRN 25 - East Horsley and West Horsley traffic management and environmental improvement scheme. It is not clear what is proposed here, and its timing and funding have to be considered uncertain. It is stated that funding will, at least in part, come from developer contribution. However, it is not at all clear what development is likely to give rise to such a contribution, but it certainly implies that funding could only come if there were a development; and

HSC 5 - Expansion of East Horsley Medical Centre to provide additional capacity and services for future population in years 5 – 15 of the plan.

There are no proposals in respect of all the existing problems with for example roads, pavements, drainage, and schools. Furthermore, it is inevitable that the proposed developments in East Horsley itself and nearby, particularly in West Horsley and the proposals for Wisley, will put further strain on the existing infrastructure. There are no proposals at all to cater for this.

Although an expansion of the Medical centre is proposed in the Infrastructure Schedule, this is not until years 5 – 15 of the Plan. Given that it is already at capacity, EHPC believes that this needs to be done earlier.

Local primary schooling is also a very pertinent issue. There are 11 housing development sites identified in the LAA for East and West Horsley, which taken together would result in the building of 593 new houses in the two parishes that are today served by a single primary school - The Raleigh, in West Horsley. Planning guidance suggest that this number of new
homes will require the provision of around 150 additional primary school places to accommodate such an increase in population. Today there is no spare capacity at The Raleigh, yet no proposals are made in the Proposed Submission Local Plan to provide for any more schooling in the Horsley’s.

I believe that the failure to address the inadequacies of the existing infrastructure to meet the needs of what is there already is a serious deficiency in the Proposed Submission Local Plan.

I accordingly OBJECT to the infrastructure proposals on these grounds. I further OBJECT to the proposals for infrastructure in that they do not meet the stated objective of providing infrastructure to support the proposed developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/1816  **Respondent:** 15247265 / Aileen Aitcheson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

**POLICY I4 Green and blue infrastructure**

I support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/1801  **Respondent:** 15247265 / Aileen Aitcheson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

1. **PROTECTING POLICIES**

This section in the Proposed Submission Local Plan sets out policies concerned with protecting the environment across Guildford Borough, including the Metropolitan Green Belt.

**POLICY P1: Surrey Hills Area of Outstanding Natural Beauty (‘AONB’)**

Page 403 of 2804
The Surrey Hills AONB is one of the great treasures of Guildford Borough and I believe that protecting this area should be given the highest priority.

I therefore support Policy P1.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1802  Respondent: 15247265 / Aileen Aitcheson  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY P2: Green Belt

Local Plan Policy P2 states that: We will continue to protect the Metropolitan Green Belt. We fully and un-equivocally support this policy.

Unfortunately, despite such brave words, GBC appears to be in breach of this policy itself through the housing policies that it has set out in the Local Plan. The analysis included in the Appendix shows that around 65% of the developments proposed in the Proposed Submission Local Plan are to be built on land currently within the Metropolitan Green Belt. We consider this outcome to be outrageous.

Under NPPF rules, GBC is permitted to make allowance for factors which may constrain the delivery of new housing, such as the need to protect the Metropolitan Green Belt or the restrictions required to protect the Surrey Hills Area of Outstanding Natural Beauty (‘AONB’) which is offered protection under the NPPF comparable to that of a national park.

Although these areas make up a large proportion of the land area of Guildford Borough, GBC makes no attempt to reduce its housing delivery in order to take account of such constraints. I find this approach inexplicable.

There are also a number of further issues relating to the detailed implementation of this policy which are set out further below:

1. a) Paragraph 4.3.13: Proposal to inset East Horsley from the Green Belt

Policy P2 proposes that East Horsley should be inset from the Green Belt, instead of being ‘washed over’ as it is today. Currently development is permitted within the settlement boundary, although this area is still considered to be Green Belt with a particular planning regime being applicable.

East Horsley is set in a rural location and the village has the look and feel of a rural village. Its Green Belt status has been a key factor in preserving that character. Moreover, being ‘washed over’ by the Green Belt has not been a serious constraint on development within the village. For example, GBC’s planning records indicate that no less than 149 net new homes were added to the village housing stock through in-filling and brownfield developments between 2000 and 2015.

GBC attributes the need to inset East Horsley to NPPF requirements, arguing that the test for remaining ‘washed over’ is that the village should make an important contribution to the openness of the Green Belt. This East Horsley clearly does.

No less than 36% of East Horsley is composed of woodlands, whilst inside the settlement area there is an average housing density of just 8.1 dwellings per hectare (‘dph’). Woodlands and large residential gardens make a vital contribution towards bio-diversity, provide wildlife corridors, and furnish those open spaces which are vital to the character of the greenbelt. It is
one thing for a planner to study a map and see a settlement area filled with housing, but it is quite another actually to come to a rural village like East Horsley and see how the Green Belt has preserved the rural character and openness of this village.

Today East Horsley is a picturesque and flourishing rural community, which has and continues to experience steady incremental growth as a result of being ‘washed over’ by the Green Belt. As the saying goes: “If it ain’t broke, don’t fix it”. This applies to East Horsley in the matter of insetting.

I therefore OBJECT to the proposal to inset East Horsley from the Green Belt and request that this proposal be dropped from the Local Plan.

1. b) Paragraph 4.3.16 and Proposals Map: Settlement Boundary changes in East Horsley

GBC are proposing to make a number of changes to the settlement boundaries of East Horsley and so expand the settlement area, as set out in the Proposals Map, with the justifications seemingly provided in the Green Belt & Countryside Study prepared by the consultants, Pegasus.

I object to two specific boundary changes, which have been proposed, as follows:

1. There is a proposal to move the East Horsley settlement boundary westwards from behind the houses on the west side of Ockham Road North up to the eastern boundary of Lollesworth Wood. This proposal removes over 5 hectares of agricultural fields from the Green Belt. The present boundary line is clearly defined by a deep and well-maintained drainage ditch which is classified by the Environment Agency as a ‘main river line’ and therefore represents a highly defensible Green Belt boundary.

Moving this boundary west to the edge of woodland in no way improves its defensibility. Under NPPF rules Green Belt boundaries should only be changed in ‘exceptional circumstances’. I do not believe this proposal can be considered as an exceptional circumstance. Clearly the only justification for this change is to bring a large agricultural field within the settlement area in order to provide more housing land. However, under NPPF rules this is not a sufficient justification for changing a Green Belt boundary. As such, I believe it is an invalid proposal.

I accordingly OBJECT to this proposed boundary change.

1. There is also a proposal to move the East Horsley settlement boundary westwards from behind the houses on the west side of Kingston Avenue up to a tree line running along the Parish Boundary at the western edge of Kingston Meadows. The result is to take all of Kingston Meadows out of the Green Belt.

Kingston Meadows is the main public recreational space of East Horsley, comprising various sports facilities and playing fields. The present settlement boundary is clearly defined by a deep and well-maintained drainage ditch running along its eastern side. It therefore represents a very defensible Green Belt boundary. Moving this boundary westwards to the edge of woodland in no way improves its defensibility. Under NPPF rules Green Belt boundaries should only be changed in ‘exceptional circumstances’. I do not believe that this can be considered as an exceptional circumstance. As such we believe this is an invalid proposal.

I accordingly OBJECT to this proposed boundary change.

In the Green Belt & Countryside Study and its accompanying Topic Paper, GBC justifies the need to make changes in settlement boundaries in order to meet unfulfilled housing need in the Borough. However, Green Belt rules make it clear that unfulfilled housing need is not normally considered to be ‘an exceptional circumstance’. If it were the entire Green Belt would already be covered in tarmac.

The NPPF is clear that every movement in settlement boundaries must be justified by ‘exceptional circumstances’. GBC have offered only a generic justification in their Topic Paper of meeting unfulfilled housing need, but a case by case justification has not been provided. As such, I believe the settlement boundary changes referred to above (and many others) are invalid without such detailed justification.

1. c) Paragraph 4.3.17: Proposal to remove Wisley Airfield from the Green Belt
I OBJECT to the proposal to remove Wisley Airfield from the Green Belt. The only justification for this proposed change is unfulfilled housing need which is not considered an exceptional circumstance. The proposed Wisley development is discussed further below in the Site Allocation section.

1.  
   
   **d) POLICY P2: Limited In-filling**
   
   A new planning designation has been introduced called ‘the identified boundary of the village’. For East Horsley this covers a number of roads south of the A246. It is a sizeable area, covering 45 hectares, the equivalent of 23% of the present Settlement Area of the village. Within this area, Policy P2 sets out proposals that would allow ‘limited in-filling’ within this boundary.

   I find it hard to reconcile the opening statement of Policy P2 that “We will continue to protect the Metropolitan Green Belt” with this sizeable reduction in effective Green Belt status. In my opinion, this policy represents a de facto extension of the Settlement Boundary and a substantial reduction in the operational effectiveness of the Green Belt, whose effectiveness is significantly weakened where this new planning designation applies.

I accordingly OBJECT to the proposal to designate roads south of the A246 as being within the ‘identified boundary of the village’ and to allow limited infilling within this area.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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### Comment ID: PSLPP16/1803  
**Respondent:** 15247265 / Aileen Aitcheson  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

### POLICY P3: Countryside

I have no objections to this policy.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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### Comment ID: PSLPP16/1804  
**Respondent:** 15247265 / Aileen Aitcheson  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
POLICY P4: Flooding...
I support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1805  Respondent: 15247265 / Aileen Aitcheson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY P5: Thames Basin Heath Special Protection Areas
I support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1797  Respondent: 15247265 / Aileen Aitcheson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. STRATEGIC POLICIES

This section provides comments on the two basic strategic policies which provide the overall framework for the Proposed Submission Local Plan.

Policy S1: Presumption in favour of sustainable development

I support the objective of favouring sustainable development as set out in Policy S1. It is in effect merely repeating what is already NPPF policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I have carefully considered the Proposed Submission Local Plan which Guildford Borough Council (“GBC”) has now published for public consultation. My comments are set out in this letter.

I have strong concerns about the Proposed Submission Local Plan and the evidence and assumptions which support it. In particular, I do not agree with the scale of the house building programme which is being proposed by GBC. The target outlined represents a 25% increase in the housing stock of the borough, whilst I note that the Office of National Statistics (“ONS”) projects a population increase of some 15% for Guildford Borough over this same period.

I also note that the Proposed Submission Local Plan includes the statement “We will continue to protect the Metropolitan Green Belt”. I support this policy. However, unfortunately GBC appears to be in breach of this same policy through the housing policies it has set out in the Proposed Submission Local Plan, whereby some 65% of developments will be made on land that is currently Green Belt.

I am also concerned that the infrastructure proposals are inadequate even to meet the needs of what is there at the moment, let alone the proposed developments in the Local Plan.

**I therefore OBJECT to the Proposed Submission Local Plan.**

Detailed comments on the six different policy areas which form the basis of the Proposed Submission Local Plan are now set out below, followed by my comments on specific site allocation policies.

**Policy S2: Borough Wide Strategy**

This policy sets out the objective of adding 13,860 new homes to Guildford Borough over the 2013-2033 period of the Proposed Submission Local Plan, equating to an annual build of 693 new homes per annum.

I have serious concerns about the enormous scale of this building programme, which represents a net increase of 25% in the housing stock of Guildford Borough, a remarkable rate of increase for a borough in the English Home Counties. It is even more remarkable when the official statisticians at the Office of National Statistics (“ONS”) are projecting a population increase of some 15% for Guildford Borough over this same period.

Some explanation for this mismatch may partly be found in the conclusion of the West Surrey Strategic Housing Market Assessment, (“SHMA”), which looks at how the annual housing target of 693 homes is comprised. It estimates that 517 homes per annum arise from ‘the demographic starting point’ – effectively what the official statisticians at the ONS and the Department of Communities and Local Government (“DCLG”) are predicting Guildford will require based upon their population and household forecasts. To this is added in the SHMA another 120 homes per annum in order to ‘support economic growth’, a further 31 homes per annum to ‘improve affordability’ and 25 homes due to ‘student growth’, all of which totals up to 693 homes per annum target.

I find this analysis perplexing. Economic growth is already factored into the statistics produced by ONS and DCLG, so what GBC are proposing actually comes on top of the official household growth forecasts for the borough. Moreover, the GBC Affordable Housing Policy H2 is proposing that all development sites (other than the very smallest) will be required to have 40% of their homes offered as affordable housing, so why another 31 homes per annum is needed as affordable housing on top of this 40% ratio is quite incomprehensible.
Furthermore, DCLG research has concluded that there is on average a 97% correlation between population growth and household formation. Therefore, if GBC’s target of a 25% increase in housing stock were actually realised, the outcome will be that Guildford Borough would see its population rise by around 25% over this period. This means that the resultant population growth for Guildford Borough would be at a level 67% higher than the official forecasts.

One of my particular concerns in reviewing the Proposed Submission Local Plan is that the impression is conveyed upon the reader that GBC’s housing targets are effectively needed to fulfil NPPF requirements or because of central government policy – in other words that GBC has no real choice but to put forward these projections, unpalatable though they might be. However, the reality is very different. GBC has voluntarily chosen to pursue a policy of aggressive civic and economic expansion – one might perhaps term it a policy of ‘Forced Growth’ – which underpins all of the housing policies in the Local Plan. In short, the difference between the official statisticians’ forecasts and GBC’s target of a 25% increase in housing stock is entirely down to a political choice made by GBC.

Of course, there is nothing fundamentally wrong in GBC adopting a Forced Growth policy for the Borough – not as long as that policy is made clearly and explicitly and is fully supported by a majority of its electorate. However, I doubt whether this is actually the case. It is certainly not a vision that is shared by me, which unequivocally rejects GBC’s Forced Growth policy.

I accordingly OBJECT to the borough housing targets set out in Policy S2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2045  Respondent: 15247617 / Michael Curtis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object strongly to the proposals for a massive increase of new houses along the Hogs Back. We have lived in Onslow Village for over 38 years and in that time we have seen an enormous increase in traffic congestion and pollution. This proposed development is going to create a catastrophic effect in the area already blighted with severe traffic congestion. My wife and I have been retired now for the past 10 years and can only assume that our quality of life is going to change for the worse as a result of these proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1302  Respondent: 15247617 / Michael Curtis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1. SITES POLICIES

Of the many sites policies set out in the Proposed Submission Local Plan, I comment upon those in East Horsley as well as several in the surrounding area which may affect the village.

Five East Horsley sites are identified in GBC’s Land Availability Assessment (‘LAA’), two of which are allocated under policies in the Proposed Submission Local Plan. The adjacent parish of West Horsley has six sites identified in the LAA, four of which are allocated in the Proposed Submission Local Plan. Our comments on these site policies are as follows:

POLICIES A37, A38, A40 & A41, located in West Horsley

The LAA identifies six sites in West Horsley for potential development, the four largest having allocation policies within the Proposed Submission Local Plan. The total housing number arising from these six sites is 405 homes in total. For a village which had 1,124 dwellings at the 2011 Census, this represents a proportional increase of 36% over the plan period, an enormously high proportion by any standards.

The four policy sites are all located within the Green Belt. One is a partly brownfield development but the other three sites are all open fields used for agriculture and all lie within the current Green Belt at the edge of the Settlement Area. The reasons presented by the consultants, Pegasus, in the Green Belt & Countryside Study to justify these settlement boundary
movements appear to us highly questionable and in no way to meet the requirements of the NPPF that such boundary movements are only to be made in 'exceptional circumstances'. These movements clearly represent a deliberate pushing back of settlement boundaries in order to provide more greenfield sites for housing development. As such, I consider these proposed movements in settlement boundaries to be invalid.

These proposals are also contrary to the principles of the Metropolitan Green Belt. West Horsley represents one of the first ‘lines of defence’ against London urban encroachment outside of the M25 circle. Yet these policies will eliminate a significant part of this defence as they seek to expand the boundaries of this village and fill-in every bit of green space within this rural setting.

It is also totally contrary to the opening statement of Local Plan Policy P2 that “We will continue to protect the Metropolitan Green Belt” It seems that in West and East Horsley at least the draft Local Plan is doing exactly the opposite.

Given the scale of the development proposed in West Horsley, the inevitable destruction of its village character and the impact on infrastructure across West and East Horsley, I OBJECT to the site allocation policies A37, A38, A40 and A41.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/893  **Respondent:** 15247745 / Brian Aitcheson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

**POLICY A35: Land at former Wisley Airfield**

Policy A35 proposes approximately 2,000 homes to be built on the site of the former Wisley Airfield. This will lead to the creation of the largest settlement in Guildford Borough outside of Guildford town. In effect it is proposing to create a New Town in the heart of the Surrey Green Belt.

I have major concerns about this proposed development and have objected against prior planning applications at this location. I consider this proposed development to be a severe contravention of Metropolitan Green Belt policy. It will result in a New Town being created of very low sustainability which will have a major adverse impact on infrastructure across a widespread area, including East Horsley. Above all it will cause irreversible destruction to the character of one of the most picturesque and historic areas of the country.

I strongly OBJECT to this proposed policy for the reasons below.

1. **a) The proposed development represents a fundamental breach of Metropolitan Green Belt rules:**

The site forms part of the Metropolitan Green Belt. Under the NPPF, development on such Green Belt land is only permitted under ‘very special circumstances’. GBC’s Planning Officer, in assessing a previous planning application from the developer of this site, rejected their application, arguing that: It has not been demonstrated that the benefits of the proposal amount to very special circumstances such as to clearly outweigh the harm to the Green Belt and the other harm identified.
Ministerial guidance has repeatedly confirmed that unfulfilled housing need does not qualify as a very special circumstance. Whilst the developers’ previous planning application was judged and rejected based upon the 2003 GBC Local Plan, the proposal to include this site within the 2016 Proposed Submission Local Plan does not fundamentally change the argument against it. Any removal of this site from the Green Belt can only be made based upon ‘exceptional circumstances’, which cannot be justified on the basis of unfulfilled housing need. If this was the case, then the entire Metropolitan Green Belt would already have become filled with housing.

Removal of this site from the Green Belt is totally against its rules, regulations and underlying spirit. The site location at the edge of the M25 circle represents a ‘first line of defence’ against metropolitan encroachment into the Surrey countryside. If this site is developed then it becomes only a question of time before Guildford itself is absorbed into the sprawling London conurbation.

Accordingly, I OBJECT to Policy A35 as a fundamental breach of the Metropolitan Green Belt rules.

1.  b) This site does not meet acceptable levels of sustainability:

Sustainability Appraisal is a core concept of planning policy, yet this site is rated very poorly in terms of its sustainability.

The sustainability appraisal undertaken by GBC’s consultant, AECOM, is presented in the Local Plan Evidence Base report ‘Sustainability Appraisal (SA) of the Guildford Borough Local Plan’ issued in June 2016. In their report AECOM have graded all Local Plan policy sites according to 21 different criteria using the conventional ‘traffic light’ system. Red colouring signifies poor sustainability. Of the six larger sites included in their evaluation, (those with proposed housing numbers of 1000 homes or greater), AECOM rates Site A35 as the very worst of all in terms of its sustainability. No less than 8 out of the 21 criteria are graded as ‘Red’ by AECOM for this site, more than any other large site.

Detailed reasons why this site has such poor sustainability include the following:

- There is currently no infrastructure whatsoever at this site, meaning that all water, electricity, gas and phone services will need to be newly established;

- New large-scale sewage disposal will be needed, a fact recognised by Thames Water, indicating it may take 3+ years to provide adequate sewage handling facilities for this site;

- There are presently no schools, medical services or shops within walking distance of this site;

- There is presently no local employment at this site and little after the development is completed;

- There will be a significant destruction of agricultural land arising from this development;

- There will be significant environmental damage from this development;

- There is no public transport currently serving this location;
• The nearest train stations are Horsley and Effingham Junction, both around 3 miles away and so too far to walk. Neither station currently has significant parking capacity available.

• Travel from this site will be primarily dependent upon motor vehicles. Any new site so dependent upon motor vehicles for transport cannot be considered as being ‘sustainable’;

• New access roads will be needed and significant changes proposed to the surrounding road network, leading to further pressure on over-crowded rural roads and increase in the traffic congestion in nearby settlements;

Whilst some of these issues may be mitigated, e.g. by building new schools, medical facilities, etc, others such as the environmental issues and infrastructure impact may not. This proposal, fundamentally, represents an attempt to create a large-scale new settlement in a poorly-sited green field location. However, as the GBC’s own consultant has demonstrated, this site does not reach acceptable minimum levels of sustainability.

Accordingly, I OBJECT to Policy A35 on grounds of its unacceptable sustainability.

1. c) The site will have a severe impact on local traffic & infrastructure:

The proposed development will have a severe adverse impact on road traffic in the surrounding area. This includes East Horsley where high volumes of additional traffic are likely from the residents of this new settlement accessing East Horsley’s two stations, shops and nearby schools. Most of the rural roads in this area are narrow winding ‘lanes’ – a term used in a recent local public meeting by John Furey, senior SCC councillor for Infrastructure to describe East Horsley’s through roads. Many of these ‘lanes’ are without pavements for large stretches, whilst the principal through-roads of Ockham Road South and Forest Road pass along unlit residential areas so narrow that two buses cannot cross in many sections of these ‘lanes’.

The road closures and junction changes being proposed to accompany this development will only serve to increase traffic volumes through the village centres of East Horsley, Cobham and Ripley, and around the station at Effingham Junction, all of which already suffer from traffic congestion at peak hours. The further increase in traffic congestion at the A3-M25 intersection would only exacerbate an existing problem for the highways authority - we understand Highways England have repeatedly expressed serious concerns about this development.

Neither Horsley nor Effingham Junction railway stations currently have any significant spare parking capacity. The suggestion of the developer that large numbers of cyclists from Site A35 will cycle 6 or 7 miles each day along busy roads in order to travel there and back to these stations lacks credibility. Other village facilities in East Horsley, such as the medical centre, are also likely to suffer adversely from a substantial increase in users as a result of this proposed development.

Accordingly, I OBJECT to Policy A35 on grounds of its severe impact on local infrastructure.

1. d) There are damaging health & safety implications arising from development at this site:
The site is located close to the junction of the M25 and A3, one of the busiest road junctions in the country. The Nitrous Oxide (‘NOx’) emissions recorded around this area are extremely high and will affect residents living at the proposed site. The proposal to build new primary and secondary schools at this location is also contrary to government policy prohibiting the building of schools on sites in areas where there is high NOx.

In rejecting the previous planning application by the developers, the GBC Planning Officer cited the “failure to provide adequate information on NOx emissions and nitrogen deposition and to provide any information on acid deposition” as one of the grounds for this rejection.

Accordingly, I OBJECT to Policy A35 on grounds of its adverse health & safety implications.

1. **e) The environmental impact on protected wildlife will be substantial:**

   GBC’s *Land Availability Assessment* which supports Policy A35 states that the site lies within the 400m-5km ‘Zone of Influence’ of the Thames Basin Heaths Special Protection Area (‘SPA’). This is not correct. The site is immediately adjacent to Ockham & Wisley Commons, an area designated as a Site of Special Scientific Importance (‘SSSI’), which forms one part of the Thames Basin Heaths SPA and much of the site lies within the 400m Exclusion Zone where new building is effectively prohibited.

   The SPA was set up to provide protection for rare and threatened birdlife in certain lowland heath locations, the provisions of which were agreed by GBC in its ‘Thames Basin Heaths SPA Avoidance Strategy’.

   This strategy establishes zones to protect the SPA from the impact of new development, particularly from the damage caused by pets (dogs, cats, etc) of local residents to the habitats of threatened ground-nesting birds. Land within 400m of the SPA is designated as an ‘Exclusion Zone’ where “there will be a presumption against additional new dwellings”. Since the Wisley Airfield site is immediately adjacent to Ockham Common for a significant length, much of this site falls within 400m of the SPA Exclusion Zone.

   The remaining portion of this site falls within the 400m - 5km ‘Zone of Influence’ set out under the SPA policy, which requires developers to contribute a new SANG (‘Site of Alternative Natural Greenspace’) to mitigate for potential damage caused to the SPA from new development – the size of the SANG is a function of the scale of the development. In their previous planning application the developers proposed that the land within the 400m Exclusion Zone would provide their SANG contribution. If accepted as a SANG, this would only encourage the 5000+ residents of the new settlement to allow their pets access into this space, therefore defeating the objective of the SANG mitigation.

   Even with the 400m Exclusion Zone in effect, the positioning of such a large site immediately adjacent to such an important protected space will inevitably have a major detrimental impact on the wildlife within it.

   Accordingly, I OBJECT to Policy A35 on grounds of its material adverse environmental impact.

The impact of the Exclusion Zone and SANG requirements, together with the need to provide for the existing waste facility, means that the actual area of land available for housing development at this site is estimated to be around 43 hectares.

1. **f) The development is totally out of keeping with local character, context & distinctiveness:**

   It is a key element of planning policy that new developments should be in keeping with the established pattern of development in the area. In the 2016 Proposed Submission Local Plan, GBC’s very first housing policy, Policy H1,
requires that development should: “make the most efficient use of land whilst responding to local character, context and distinctiveness.” However, Policy A35 fails to do this.

With its proposal to build some 2,100 homes on and around the site of the former Wisley Airfield, Policy A35 will create a new settlement larger than any other in Guildford Borough, outside of Guildford itself. The nearby historic village of Ockham has merely 159 dwellings. It will be completely swamped by a development on such a scale.

Moreover, the design and density of the proposed development will be completely out of context with its surrounding area. Due to the restrictions of the SPA Exclusion Zone, the need for SANG provision and the land needed for the waste facility, the actual land area to be used for housing development under Policy A35 is estimated to be around 43 hectares. Therefore, with 2,100 homes proposed for this site, the overall housing density of the settlement area may be calculated at around 49 dwellings per hectare (‘dph’).

East Horsley, just three miles from this site, is the largest settlement in Guildford borough outside of Guildford town, with some 1,760 homes. East Horsley presently has an overall housing density of 8.1 dph within its settlement area. Therefore, the proposed development under Policy A35 is six times as dense as the nearest settlement of a comparable size. The proposed development under Policy A35 therefore utterly fails to respond to local context and as such is in breach of GBC’s own Housing Policy H1.

The density of 49 dph proposed under Policy A35 is effectively an urban density appropriate for a metropolitan location. It is to be achieved in part by building apartment blocks of five stories in height, according to the designs previously presented by the developer. For a setting within the middle of rural Surrey this is completely out of character.

Other settlements close to this site are small rural villages such as Ockham, West Horsley and Ripley. These villages have grown up organically over a thousand years. They contain many historic, listed or otherwise protected buildings as well as a range of residential housing, predominantly detached two-storey houses or bungalows. They are all picturesque villages with charm and character. Visitors come to the area to enjoy some of the prettiest villages and countryside in southern England, all within easy access of London. The character of this whole area would be irreparably destroyed if this development goes ahead.

Accordingly, I OBJECT to Policy A35 on the grounds that it is out of keeping with local character, context and distinctiveness, and therefore breaches the NPPF and emerging GBC Policy H1.

Concluding remarks

I do not share the same vision for the future of Guildford Borough as GBC, although I do recognise that an enormous volume of work has gone into the preparation of the Proposed Submission Local Plan, which is now out for public consultation.

However, after more than 20,000 responses were submitted in 2014 in connection with the previous draft Local Plan, most of them opposed to its proposals, GBC has made relatively few changes from the earlier version and none of any materiality.

At the heart of the problem is GBC’s desire to pursue a ‘Forced Growth’ policy which results in highly aggressive and unjustified targets being set for housing development in the Borough. These excessive targets – the proposed 25% increase in housing stock in particular – create a tremendous strain on both land and infrastructure in an already over-crowded and over-stretched part of the country.

These targets will also have a material adverse impact on the Metropolitan Green Belt across this area, despite all the political promises made to the contrary. The irony of Policy P2 which states that “We will continue to protect the Metropolitan Green Belt” does not fool anybody.

Accordingly I OBJECT to the Proposed Submission Local Plan.
I sincerely request that GBC that radically re-assess its own policy objectives rather than force through the Council a Local Plan which clearly does not have the wider support of the residents of Guildford Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A36</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY A36: Hotel, Guildford Road

Policy A36 proposes to re-develop the current Thatcher’s Hotel for housing.

I am concerned about the loss of this long-standing village hotel and significant employer. However, assuming that the employment loss can be justified, (which is a condition of Policy A36), then I am broadly supportive of housing development at this location, providing it is done in a manner that is in keeping with its prominent landmark position at the entrance to the village. The site is also close to the East Horsley Conservation Area and housing designs and site configuration must reflect the sensitivity of this setting.

Whilst I endorse many of the requirements set out in Policy A36, my principal concern is over the number of houses proposed for this site - approximately 48 dwellings. This number gives an implied gross housing density of 37 dwellings per hectare, which is exceptionally high for this location. The average housing density across the East Horsley Settlement Area is 8.1 dwellings per hectare and the highest density found in any of the roads around this location is 13 dwellings per hectare.

I would only support development at this location if it has a significantly lower housing density.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A39</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY A39: Land behind Ockham Road North, near Horsley railway station

Policy A39 proposes a housing development of some 100 dwellings on a 5.7 acre green-field Green Belt site behind the houses on the western side of Ockham Road North. Access is to be secured by demolishing the first two houses next to the railway bridge.

As discussed earlier, I consider that the proposed western movement of the settlement boundary needed to bring this site within the settlement area is unjustified and contrary to NPPF rules. If this boundary movement is invalid, as I believe, then this site remains a part of the Metropolitan Green Belt. As such and with no ‘very special circumstances’ to justify housing development upon it, I OBJECT to Policy A39.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1835  Respondent: 15247745 / Brian Aitcheson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. DESIGN POLICIES

This section sets out the basis for a number of design policies relating to proposed developments in the Borough.

POLICY D1: Making better places

I support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1836  Respondent: 15247745 / Brian Aitcheson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY D2: Sustainable design, construction & energy

I support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1837   Respondent: 15247745 / Brian Aitcheson   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY D3: Historic environment

East Horsley contains a wide range of heritage assets which make an important contribution to the look and feel of the village and its character. I fully support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1838   Respondent: 15247745 / Brian Aitcheson   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY D4: Development in urban areas and inset villages

We support this design policy, although not the proposal of Policy P2 to inset East Horsley from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1830   Respondent: 15247745 / Brian Aitcheson   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. ECONOMY POLICIES

POLICY E1: Sustainable employment

I support the general policy statements made in this policy, whilst having no opinion on the scale of the new office space and industrial land area being proposed by GBC.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1831  Respondent: 15247745 / Brian Aitcheson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E2: Location for new employment floorspace

Under this policy, areas within 500 meters of a "public transport interchange" play a key role.

Proposals for new office and research and development floorspace are to be directed to firstly Guildford town centre and then to areas within 500 meters of a public transport interchange ("PTI").

East Horsley has two railway stations, Horsley Station and Effingham Junction Station, but currently the draft Local Plan only proposes that Horsley Station should have PTI status.

The explanation given at 4.4.17 for Effingham Junction Station ("EJS") not enjoying this status is that either it is located within the Green Belt, or it is within an AONB or it is isolated away from the village or centre. It is not clear which of these applies to this particular station, but we believe strongly that none apply and that there is a strong case for EJS deserving PTI status in the same way as Horsley Station.

I will deal firstly with the three alternative reasons given for EJS not supposedly qualifying as a PTI.

Firstly there is the Green Belt aspect. This is not logical since if location within the Green Belt were determinative, this would mean that Horsley Station would also fail to gain PTI status.

Also the draft Local Plan proposes elsewhere at Policy P2 that the whole of East Horsley, including both Horsley Station and EJS, should be inset from the Green Belt. It will be seen elsewhere in these comments that I object strongly to this proposal, but the point remains that if location within the Green Belt were a valid reason for not being given PTI status, the Local Plan itself makes it clear that under Policy P2 this will not apply in the case of both Horsley Station and EJS.
Secondly EJS is not located in an AONB. EJS is within the envelope of the village settlement and will remain as such under the draft Local Plan.

Thirdly EJS is not "isolated" or "away from the village centre."

Effingham Junction (the area immediately south and west of EJS, served by respectively Forest Road south of the railway bridge and Old Lane) may not have the extensive shopping parades enjoyed by East Horsley's two other centres (Station Parade and Bishopsmead Parade) but it is a thriving community with a significant population and also a significant number of active and successful employment floorspaces and sites.

These include in Forest Road a general store (Forest Road General Store), a car sales and car repair business (PJB Car Sales/The Body Shop), a dental health centre and chiropractic clinic (Mortiboys) and on Horsley Road, Cedar Garden Centre, Royce Turf and Irrigation and at the Newmarsh Farm site, a number of businesses including Richmonds Horse Transport, Braye Hydraulic Repairs and TTS Surfacing Ltd.

It is therefore vital that the Local Plan's economy policies affecting the area protect these spaces and sites and create conditions for their sustainable growth and hence job creation.

Since all or most of these businesses are located within 500 meters of EJS, Policy E2 would be an invaluable driver for such growth which could play a major role in ensuring that Effingham Junction maintained and enhanced its position as East Horsley's "third centre" for homes and jobs. On the other hand, to exclude EJS from PTI status could very well stifle its sustainable development and condemn it to a future as a dormitory "backwater" of East Horsley.

It is also counter-intuitive in the extreme to refuse EJS "PTI" status. This is for the simple reason that EJS is clearly a "public transport interchange" as that term would be normally understood. This is for the following reasons:

1. As the name "Effingham Junction" indicates, EJS is at an important junction and interchange. The railway line from Guildford splits here into two lines which take different routes into London, so many London-bound passengers will change trains here;
2. EJS serves not only the Effingham Junction area, but also the many residents of Effingham and Little Bookham for whom EJS is far closer than Bookham Station;
3. EJS also serves the many residents of the Cobham area for whom EJS is far closer than Cobham and Stoke d'Abernon station EJS also serves the residents of Ockham and Ripley;
4. EJS also serves the considerable numbers who visit local leisure activity sites, including three paintball sites and two clay pigeon shooting sites, for whom EJS is the only viable public transport hub; and
5. EJS will be the nearest railway station to the land at the former Wisley Airfield site which is proposed for the building of 2000 homes under Policy A35 of the draft Local Plan and if, despite the objections of many including East Horsley Parish Council, this proceeds, then significant numbers of residents will be taking one form of travel to EJS and then interchanging onto the railway.

I accordingly OBJECT to Policy E2 insofar as it fails to confer "public transport interchange" status on Effingham Junction Station.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICIES E3 to E7:
I have no comments on these policies.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1833  Respondent: 15247745 / Brian Aitcheson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E8: District centres
I support this policy, including the designation of Station Parade, East Horsley, as a District Centre under the draft Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1834  Respondent: 15247745 / Brian Aitcheson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E9: Local centres
I support this policy, including the designation of Bishopsmead Parade, East Horsley, as a rural Local Centre under the draft Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. HOUSING POLICIES

This section provides comments on the housing policies set out in the Proposed Submission Local Plan.

POLICY H1: Homes for all

I support the general policy statements made in this policy, which are mostly repeating NPPF policies. My main concerns, as set out previously, are primarily with the scale of new housing being proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

POLICY H2: Affordable Homes

I support the general principle that developers should be required to contribute part of their development profit towards the cost of social housing in the borough. However, this ‘one-size-fits-all’ policy is seriously flawed and likely to prove highly inefficient, if not unworkable, in the longer term.

In this policy GBC have taken no regard whatsoever of the differences in affordable housing need across the borough. This has significant consequences in East Horsley, which is the area with the lowest demand for affordable housing in the borough. Moreover, East Horsley is not classified as a ‘rural area’ under the 1997 Housing Order and therefore is not exempt from the new ‘right to acquire or enfranchise’ entitlement – a factor which is likely to see affordable houses in the parish being bought up as soon as possible and thereafter lost to the affordable sector.
Under Policy H2, 40% of all but the smallest development sites in East Horsley will be required to have affordable housing built upon them, irrespective of whether there is actually demand for more social housing in that area. Moreover, the affordable housing targets proposed in the Proposed Submission Local Plan indicate that the biggest component of affordable housing (40%) should be built as 1-bed dwellings despite the fact that GBC’s own studies show that the strongest affordable demand in the borough is actually for larger 3-bed dwellings.

As a result of this flawed affordable housing policy, a significant volume of social housing is likely to be built in places where it is not needed and offered to tenants who do not want to live there nor have jobs near that location.

Policy H2 thereby fails the test of sustainability and should be radically revised. If not, the outcome will be serious inefficiency in the provision of social housing in the borough. In an area such as East Horsley this is likely to be manifested in a rapid buying-up of properties for quick re-sale at a generous profit, at which point these homes also become lost to the affordable sector.

I accordingly OBJECT to Policy H2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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POLICY H3: Rural exception homes

I support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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1. INFRASTRUCTURE POLICIES

This section of the Proposed Submission Local Plan sets out details covering a range of infrastructure policies.

POLICIES I1, I2 & I3

These three policies cover Infrastructure & Delivery, Supporting the Department of Transport’s ‘Road Investment Strategy’ and Sustainable Transport. Whilst I support the general policy statements as presented in each case, it is the detailed infrastructure proposals for Guildford Borough which give me cause for concern.

I believe there are serious deficiencies and shortcomings in the infrastructure of Guildford Borough as it is today and that the aggressive housing policy as proposed by GBC in the Proposed Submission Local Plan will exacerbate this problem.

I would make the following comments specifically about infrastructure in East Horsley today:

- Roads across the parish are in poor condition with many potholes. Many roads are unable to sustain their current levels of traffic, particularly the increasing levels of HGV traffic;
- The principal through roads traversing East Horsley are narrow and winding, have a series of pinch points, have sections without any pavements and are generally unlit. As a senior SCC councillor remarked at a recent public meeting in the village hall: “East Horsley has lanes, not roads.” East Horsley’s ‘lanes’ are totally unsuitable for high volumes of traffic, in particular for the volume of HGV’s now using them;
- Many of the drains are blocked or otherwise in poor condition giving rise to frequent surface water flooding when it rains;
- The pavements are in poor condition. As well as being narrow, they are often uneven and/or cracked making it difficult, for example, for people with pushchairs or prams or in wheelchairs;
- There are insufficient school spaces for the number of local children needing them, with the result that children are often allocated to schools a significant distance away such as Dorking or Woking; and
- The Medical Centre in East Horsley is already at capacity in terms of its number of patients.

It is recognised that, as stated in the Proposed Submission Local Plan, the maintenance of adequate infrastructure and its expansion to meet growing needs is the responsibility of the relevant infrastructure provider. This is often not GBC itself but rather, for example, Surrey County Council or utility companies.

In respect of East Horsley, there are only two specific proposals in Appendix C:

LRN 25 - East Horsley and West Horsley traffic management and environmental improvement scheme. It is not clear what is proposed here, and its timing and funding have to be considered uncertain. It is stated that funding will, at least in part, come from developer contribution. However, it is not at all clear what development is likely to give rise to such a contribution, but it certainly implies that funding could only come if there were a development; and

HSC 5 - Expansion of East Horsley Medical Centre to provide additional capacity and services for future population in years 5 – 15 of the plan.

There are no proposals in respect of all the existing problems with for example roads, pavements, drainage, and schools.

Furthermore, it is inevitable that the proposed developments in East Horsley itself and nearby, particularly in West Horsley and the proposals for Wisley, will put further strain on the existing infrastructure. There are no proposals at all to cater for this.

Although an expansion of the Medical centre is proposed in the Infrastructure Schedule, this is not until years 5 – 15 of the Plan. Given that it is already at capacity, EHPC believes that this needs to be done earlier.

Local primary schooling is also a very pertinent issue. There are 11 housing development sites identified in the LAA for East and West Horsley, which taken together would result in the building of 593 new houses in the two parishes that are today served by a single primary school - The Raleigh, in West Horsley. Planning guidance suggest that this number of new
homes will require the provision of around 150 additional primary school places to accommodate such an increase in population. Today there is no spare capacity at The Raleigh, yet no proposals are made in the Proposed Submission Local Plan to provide for any more schooling in the Horsley’s.

I believe that the failure to address the inadequacies of the existing infrastructure to meet the needs of what is there already is a serious deficiency in the Proposed Submission Local Plan.

I accordingly OBJECT to the infrastructure proposals on these grounds. I further OBJECT to the proposals for infrastructure in that they do not meet the stated objective of providing infrastructure to support the proposed developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/1840  Respondent:  15247745 / Brian Aitcheson  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY I4 Green and blue infrastructure

I support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/1825  Respondent:  15247745 / Brian Aitcheson  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. PROTECTING POLICIES

This section in the Proposed Submission Local Plan sets out policies concerned with protecting the environment across Guildford Borough, including the Metropolitan Green Belt.

POLICY P1: Surrey Hills Area of Outstanding Natural Beauty (‘AONB’)
The Surrey Hills AONB is one of the great treasures of Guildford Borough and I believe that protecting this area should be given the highest priority.

I therefore support Policy P1.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1826  Respondent: 15247745 / Brian Aitcheson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY P2: Green Belt

Local Plan Policy P2 states that: We will continue to protect the Metropolitan Green Belt. We fully and un-equivocally support this policy.

Unfortunately, despite such brave words, GBC appears to be in breach of this policy itself through the housing policies that it has set out in the Local Plan. The analysis included in the Appendix shows that around 65% of the developments proposed in the Proposed Submission Local Plan are to be built on land currently within the Metropolitan Green Belt. We consider this outcome to be outrageous.

Under NPPF rules, GBC is permitted to make allowance for factors which may constrain the delivery of new housing, such as the need to protect the Metropolitan Green Belt or the restrictions required to protect the Surrey Hills Area of Outstanding Natural Beauty (‘AONB’) which is offered protection under the NPPF comparable to that of a national park. Although these areas make up a large proportion of the land area of Guildford Borough, GBC makes no attempt to reduce its housing delivery in order to take account of such constraints. I find this approach inexplicable.

There are also a number of further issues relating to the detailed implementation of this policy which are set out further below:

1. a) Paragraph 4.3.13: Proposal to inset East Horsley from the Green Belt

Policy P2 proposes that East Horsley should be inset from the Green Belt, instead of being ‘washed over’ as it is today. Currently development is permitted within the settlement boundary, although this area is still considered to be Green Belt with a particular planning regime being applicable.

East Horsley is set in a rural location and the village has the look and feel of a rural village. Its Green Belt status has been a key factor in preserving that character. Moreover, being ‘washed over’ by the Green Belt has not been a serious constraint on development within the village. For example, GBC’s planning records indicate that no less than 149 net new homes were added to the village housing stock through in-filling and brownfield developments between 2000 and 2015.

GBC attributes the need to inset East Horsley to NPPF requirements, arguing that the test for remaining ‘washed over’ is that the village should make an important contribution to the openness of the Green Belt. This East Horsley clearly does. No less than 36% of East Horsley is composed of woodlands, whilst inside the settlement area there is an average housing density of just 8.1 dwellings per hectare (‘dph’). Woodlands and large residential gardens make a vital contribution towards bio-diversity, provide wildlife corridors, and furnish those open spaces which are vital to the character of the greenbelt. It is...
one thing for a planner to study a map and see a settlement area filled with housing, but it is quite another actually to come to a rural village like East Horsley and see how the Green Belt has preserved the rural character and openness of this village.

Today East Horsley is a picturesque and flourishing rural community, which has and continues to experience steady incremental growth as a result of being ‘washed over’ by the Green Belt. As the saying goes: “If it ain’t broke, don’t fix it”. This applies to East Horsley in the matter of insetting.

I therefore OBJECT to the proposal to inset East Horsley from the Green Belt and request that this proposal be dropped from the Local Plan.

1. **b) Paragraph 4.3.16 and Proposals Map: Settlement Boundary changes in East Horsley**

GBC are proposing to make a number of changes to the settlement boundaries of East Horsley and so expand the settlement area, as set out in the Proposals Map, with the justifications seemingly provided in the Green Belt & Countryside Study prepared by the consultants, Pegasus.

I object to two specific boundary changes, which have been proposed, as follows:

1. There is a proposal to move the East Horsley settlement boundary westwards from behind the houses on the west side of Ockham Road North up to the eastern boundary of Lollesworth Wood. This proposal removes over 5 hectares of agricultural fields from the Green Belt. The present boundary line is clearly defined by a deep and well-maintained drainage ditch which is classified by the Environment Agency as a ‘main river line’ and therefore represents a highly defensible Green Belt boundary.

Moving this boundary west to the edge of woodland in no way improves its defensibility. Under NPPF rules Green Belt boundaries should only be changed in ‘exceptional circumstances’. I do not believe this proposal can be considered as an exceptional circumstance. Clearly the only justification for this change is to bring a large agricultural field within the settlement area in order to provide more housing land. However, under NPPF rules this is not a sufficient justification for changing a Green Belt boundary. As such, I believe it is an invalid proposal.

I accordingly OBJECT to this proposed boundary change.

1. There is also a proposal to move the East Horsley settlement boundary westwards from behind the houses on the west side of Kingston Avenue up to a tree line running along the Parish Boundary at the western edge of Kingston Meadows. The result is to take all of Kingston Meadows out of the Green Belt.

Kingston Meadows is the main public recreational space of East Horsley, comprising various sports facilities and playing fields. The present settlement boundary is clearly defined by a deep and well-maintained drainage ditch running along its eastern side. It therefore represents a very defensible Green Belt boundary. Moving this boundary westwards to the edge of woodland in no way improves its defensibility. Under NPPF rules Green Belt boundaries should only be changed in ‘exceptional circumstances’. I do not believe that this can be considered as an exceptional circumstance. As such we believe this is an invalid proposal.

I accordingly OBJECT to this proposed boundary change.

In the Green Belt & Countryside Study and its accompanying Topic Paper, GBC justifies the need to make changes in settlement boundaries in order to meet unfulfilled housing need in the Borough. However, Green Belt rules make it clear that unfulfilled housing need is not normally considered to be ‘an exceptional circumstance’. If it were the entire Green Belt would already be covered in tarmac.

The NPPF is clear that every movement in settlement boundaries must be justified by ‘exceptional circumstances’. GBC have offered only a generic justification in their Topic Paper of meeting unfulfilled housing need, but a case by case justification has not been provided. As such, I believe the settlement boundary changes referred to above (and many others) are invalid without such detailed justification.

1. **c) Paragraph 4.3.17: Proposal to remove Wisley Airfield from the Green Belt**
I OBJECT to the proposal to remove Wisley Airfield from the Green Belt. The only justification for this proposed change is unfulfilled housing need which is not considered an exceptional circumstance. The proposed Wisley development is discussed further below in the Site Allocation section.

1.  
   d) POLICY P2: Limited In-filling

A new planning designation has been introduced called ‘the identified boundary of the village’. For East Horsley this covers a number of roads south of the A246. It is a sizeable area, covering 45 hectares, the equivalent of 23% of the present Settlement Area of the village. Within this area, Policy P2 sets out proposals that would allow ‘limited in-filling’ within this boundary.

I find it hard to reconcile the opening statement of Policy P2 that “We will continue to protect the Metropolitan Green Belt” with this sizeable reduction in effective Green Belt status. In my opinion, this policy represents a de facto extension of the Settlement Boundary and a substantial reduction in the operational effectiveness of the Green Belt, whose effectiveness is significantly weakened where this new planning designation applies.

I accordingly OBJECT to the proposal to designate roads south of the A246 as being within the ‘identified boundary of the village’ and to allow limited infilling within this area.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**POLICY P3: Countryside**

I have no objections to this policy.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY P4: Flooding...
I support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1829  Respondent: 15247745 / Brian Aitcheson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY P5: Thames Basin Heath Special Protection Areas
I support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1821  Respondent: 15247745 / Brian Aitcheson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. STRATEGIC POLICIES
This section provides comments on the two basic strategic policies which provide the overall framework for the Proposed Submission Local Plan.

Policy S1: Presumption in favour of sustainable development
I support the objective of favouring sustainable development as set out in Policy S1. It is in effect merely repeating what is already NPPF policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comments on Proposed Submission Local Plan

I have carefully considered the Proposed Submission Local Plan which Guildford Borough Council (“GBC”) has now published for public consultation. My comments are set out in this letter.

I have strong concerns about the Proposed Submission Local Plan and the evidence and assumptions which support it. In particular, I do not agree with the scale of the house building programme which is being proposed by GBC. The target outlined represents a 25% increase in the housing stock of the borough, whilst I note that the Office of National Statistics (“ONS”) projects a population increase of some 15% for Guildford Borough over this same period.

I also note that the Proposed Submission Local Plan includes the statement “We will continue to protect the Metropolitan Green Belt”. I support this policy. However, unfortunately GBC appears to be in breach of this same policy through the housing policies it has set out in the Proposed Submission Local Plan, whereby some 65% of developments will be made on land that is currently Green Belt.

I am also concerned that the infrastructure proposals are inadequate even to meet the needs of what is there at the moment, let alone the proposed developments in the Local Plan.

I therefore OBJECT to the Proposed Submission Local Plan.

Detailed comments on the six different policy areas which form the basis of the Proposed Submission Local Plan are now set out below, followed by my comments on specific site allocation policies.

Policy S2: Borough Wide Strategy

This policy sets out the objective of adding 13,860 new homes to Guildford Borough over the 2013-2033 period of the Proposed Submission Local Plan, equating to an annual build of 693 new homes per annum.

I have serious concerns about the enormous scale of this building programme, which represents a net increase of 25% in the housing stock of Guildford Borough, a remarkable rate of increase for a borough in the English Home Counties. It is even more remarkable when the official statisticians at the Office of National Statistics (“ONS”) are projecting a population increase of some 15% for Guildford Borough over this same period.

Some explanation for this mismatch may partly be found in the conclusion of the West Surrey Strategic Housing Market Assessment, (“SHMA”), which looks at how the annual housing target of 693 homes is comprised. It estimates that 517 homes per annum arise from ‘the demographic starting point’ – effectively what the official statisticians at the ONS and the Department of Communities and Local Government (“DCLG”) are predicting Guildford will require based upon their population and household forecasts. To this is added in the SHMA another 120 homes per annum in order to ‘support economic growth’, a further 31 homes per annum to ‘improve affordability’ and 25 homes due to ‘student growth’, all of which totals up to 693 homes per annum target.

I find this analysis perplexing. Economic growth is already factored into the statistics produced by ONS and DCLG, so what GBC are proposing actually comes on top of the official household growth forecasts for the borough. Moreover, the GBC Affordable Housing Policy H2 is proposing that all development sites (other than the very smallest) will be required to have 40% of their homes offered as affordable housing, so why another 31 homes per annum is needed as affordable housing on top of this 40% ratio is quite incomprehensible.
Furthermore, DCLG research has concluded that there is on average a 97% correlation between population growth and household formation. Therefore, if GBC’s target of a 25% increase in housing stock were actually realised, the outcome will be that Guildford Borough would see its population rise by around 25% over this period. This means that the resultant population growth for Guildford Borough would be at a level 67% higher than the official forecasts.

One of my particular concerns in reviewing the Proposed Submission Local Plan is that the impression is conveyed upon the reader that GBC’s housing targets are effectively needed to fulfil NPPF requirements or because of central government policy – in other words that GBC has no real choice but to put forward these projections, unpalatable though they might be. However, the reality is very different. GBC has voluntarily chosen to pursue a policy of aggressive civic and economic expansion – one might perhaps term it a policy of ‘Forced Growth’ – which underpins all of the housing policies in the Local Plan. In short, the difference between the official statisticians’ forecasts and GBC’s target of a 25% increase in housing stock is entirely down to a political choice made by GBC.

Of course, there is nothing fundamentally wrong in GBC adopting a Forced Growth policy for the Borough – not as long as that policy is made clearly and explicitly and is fully supported by a majority of its electorate. However, I doubt whether this is actually the case. It is certainly not a vision that is shared by me, which unequivocally rejects GBC’s Forced Growth policy.

I accordingly OBJECT to the borough housing targets set out in Policy S2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/1133  **Respondent:** 15247809 / Christopher McLaughlin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? (No), is Sound? (No), is Legally Compliant? (No)

Answer (if comment is on questions 1-7 of the questionnaire): ()

Dear Councillors:

I'm writing to express my disbelief at the bogus proposal to forever destroy green belt land in Normandy and Flexford, while increasing the size of our village by 100%, on the basis that a school is justified in our location named A-46 in the draft local plan. What is proposed is wrong on every level, including scale, when David Cameron himself has said repeatedly that "we will always protect the Green Belt and make sure planning decisions are made by local people." Where was any consultation with the residents of Normandy and Flexford? Given the 100% opposition to this by the residents of Normandy, you seem not to be concerned about our wishes. However the proposal should fail on the basis that a school in location A46 is simply not required by any reasoning. In no particular order:

Green Belt - The Green Belt was enacted by forward thinking visionaries who knew the value of open space for future generations, before the importance of battling climate change was even though about. In fact, Surrey was a leading advocate for its creation. Yet you propose to create a continuous concrete strip from the west of Aldershot right through to the east of Guildford that will affect the physical and mental wellbeing of all, while specifically sentencing the residents of our small village to a lifetime of noise, pollution, traffic stress, all health and safety nightmares, for the short term gain of a greedy developer and some short sighted local government officials who will be remembered by history as those who destroyed what was once meant to be preserved for the good of the nation. One of the characteristics of the green belt is that a sense of "openness" is preserved. How does this concrete strip allow for that? The green belt in Normandy is a vital part of the barrier between Ash and Guildford. Flooding, traffic, and accidents on the A323 already drive an intolerable...
amount of traffic onto our D roads. This proposal will result in permanent gridlock. Your stated aim of development is to concentrate on brownfield sites yet 70% of the development you now propose is on greenfield sites, including green belt land, to the detriment of all. Why are you not developing Wisley Aerodrome and its miles of concrete? Or all of the brownfield sites within Guildford itself where the need for expansion exists. And two motorways and Major A road? Instead, because of a developer led whim, you chose our little village.

Transportation and road infrastructure - Normandy with its tricky intersections, narrow lanes, with parked cars narrowing them still further, the one lane railway tunnel on Westwood Lane, unaddressed in the plan, that daily sees accidents and near misses are totally unsuitable for this scale of development. Turning onto the A323 from Westwood Lane is already hazardous and where Glazier's Lane meets Westwood Lane, approaching traffic cannot easily be seen, usually is doing 40 mph+, and again, near misses are common. The railway bridge on Glazier's Lane is narrow, traffic is difficult to see, and among these various traffic risk areas, no improvement can be foreseen that will allow the additional thousands of journeys per day, let alone tens of thousands of vehicle movements that will arise from the proposed development. Pedestrian pavements are at times dangerous and generally entirely inadequate with awful street lighting. There is insufficient space for bicycle paths. And the Wanborough railway station is tiny and there is no scope for making it larger, nor are there plans to enlarge it during the lifetime of the plan. Due to the bridges, double decker buses will never be able to run through this area.

Where Wanborough Hill meets the Hog's Back, again this very steep hill with numerous traffic issues feeds into an already congested A31 and to dump many more thousands of car journeys daily into this area will simply grind the whole place to an absolute halt. It is already backed up every morning and a journey to Guildford can take 30-40 minutes NOW. Lip service has been paid to "improving" this terrible intersection without stating how it will be funded adequately. And will you shave the top off the Hog's Back to make it wider so you can fit more lanes in to funnel the vastly increased traffic onto the impossible to widen A31? How will that increased traffic be then directed onto the A3 or down the hill into town? Locally, our roads will exceed their design capacity almost continuously.

And you can't just put speed bumps everywhere and say the problem is solved. THE ROADS ARE SIMPLY UNSUITABLE AND WILL NOT TOLERATE THIS INCREASE IN TRAFFIC. It has been mentioned that the railway station is one of the things that makes this project sustainable. How is Wanborough with a tiny station, tiny platform, sporadic service, no parking, adequate for the thousands of new people? So it's back to cars and pollution and stress and gridlock. Hardly the hallmarks of modern sustainability. Once we add the school runs for the proposed "free school," this falls apart even quicker on every major quality of life measure. Adding a percentage to a settlement is one thing. Doubling and destroying it is entirely another.

Need for a school - In order to develop the green belt, there must be an EXCEPTIONAL NEED. So far as we can all see, the only need is for Taylor Wimpey to make a quick buck. Paul Spooner is on record as saying that "a school or hospital will trump all other planning considerations. So Taylor Wimpey have pulled a school out of their hat in the two years that talks have apparently been taking place, presumably to try and circumvent planning rules.

Yet there is plenty of space at local schools as yet unfilled and recent planning decisions have included the decision NOT to tear down an existing school as there was insufficient need to destroy it versus harm to the green belt. Virtually every school in the Borough of Guildford is undersubscribed at the moment, some by as much as 60%. A better location might have been Blackwell Farm. A school is currently being built in Mayford on the side of the borough where the need is greatest. Ash has plenty of vacancies and our proximity to Hampshire and the schools it has are not considered or discussed. Normandy has an aging population with very few school age children while the birth rate in Guildford is declining. A questions was asked at a local meeting recently: "How many people have kids 12-16 in school here now?" 6 hands went up out of 300. A 20 y/o girl said she had NO friends here in school while she was in school. A huge new school that there is no need for in a place that neither needs nor wants it is a huge unsustainable cost. It is better to expand existing schools and why not try and fill the existing ones up in the first place? To which the new one in Mayford can be added.

If we add to this the destruction of ancient woodlands, flood prone and muddy clay soil, dangerous traffic conditions for the students due to inadequate roads, it becomes even more unsustainable.

And why 1100 houses? - Is that perhaps because Taylor Wimpey says so? Even though that scale of development will be catastrophic for all of our residents? With half a dozen supermarkets and large retail shopping areas within ten minutes drive, it's no surprise that every Normandy business, pub, etc. (with the exception of the niche motorcycle parts store) has...
closed down over the last twenty years. The shop, the post office, Spar market, all of them. So throwing in a little market won't make anything better and will merely add to the car journeys until it closes too.

On your own website you say that the "Local Plan will help tackle the borough's potential housing crisis." So we have houses that are only "potentially" needed, in an area that doesn't require a school. THIS IS NOT THE EXCEPTIONAL NEED THAT IS REQUIRED TO OVERTURN GREEN BELT DESIGNATION. It is exceptional greed at the expense of an entire village and the law does not provide for the whimsical destruction of green belt land when so many alternatives exist. And there is a long and proud track record with such developments of building and selling all the houses only to find that there are insufficient funds to pay for the promised school. Let alone the road improvements that are alluded to. Post-Brexit, England will likely see a decrease in immigration to go with the declining birth rate in Guildford. It was interesting to note that trading in shares of Taylor Wimpey was suspended after the announcement of the Brexit referendum result.

Environment - In the last local plan, the site was given a "red" level of sensitivity. We have 22 listed building in Normandy, 7 within the perimeter of this so called development. We have 500 year old trees right in the middle of it. We have bats, badgers, newts, hedgehogs, extensive native species of birds, flowers, etc. Bats every night right now. Has anyone noticed that we flood here? Has a proper assessment of flooding risk been made? Or the added burden to our surrounding protected nature areas? The Thames Basin Heath SPA is just across the A323 and will suffer terribly as a result of the vastly increased traffic, pollution, dog walking, etc. Light pollution will adversely affect the Surrey Hills Area of Outstanding Natural Beauty. Let alone the destruction of Green Belt land itself. To quote our MP, Jonathan Lord, "it is simply inexcusable to build here."

3850 homes for 5000 people were proposed in Aldershot on MOD land. GBC responded in 2013 to say that the impact on Surrey roads was not considered. Particularly the A323. Yet this proposal would add catastrophic amounts of traffic to all local roads.

I could go on forever. But why are the local residents being ignored when not a single one of us moved here for the "exciting opportunity to have our lives thoroughly blighted, as a whole community, for decades to come!!" Why have none of the important impact things been looked at at all? Why are you proposing to act contrarily to the intent of the green belt legislation meant to preserve at least a little ring of life outside London for your kids and theirs? Where are they going to go to escape the pollution, traffic danger and chaos this will bring? Why aren't the needs of Guildford being addressed by providing infrastructure near the town where the demand and ability to absorb it is? And there is ABSOLUTELY NO EXCEPTIONAL NEED FOR THIS SCHOOL AND DEVELOPMENT SUCH THAT VIOLATING THE GREEN BELT IS REQUIRED OR DESIRED BY ANY CITIZEN. None of us have done anything to deserve this death sentence for our little community.

In summary, as for legal compliance, this proposal rides roughshod over green belt legislation without there being an exceptional need, nor any need for a school in this location and it is hugely detrimental to nearby legislated areas. As far as soundness goes, it does not achieve sustainable development nor is it justified or effective in any way. In fact, it is entirely unjustified. And to say that there has been any compliance with a duty to cooperate is an absolute joke. This development has been sprung on us without warning, and with minimal time to respond. The whole thing stinks, in fact, of absolute dishonesty from stem to stern.

Thank you for taking the time to read this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Respondent: 15248161 / Fabio Ligi</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the huge proposed building of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm. This will ruin large chunks of Green Belt and agricultural land and will add pressure on our area in terms of traffic in an already congested area, particularly the A3 / M25 area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to additional construction on Tannery Lane. There is already planning permission for building there but the road there is very narrow and additional development should be out of the question. This is a quiet country lane which we use to walk the dogs. It adjoins the canal and to widen this road and turn it into a busy through route is incomprehensible. The entrance to this road to the main road from Ripley and Send Road is extremely narrow and cannot take further traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to the proposed industrial development of 7,000 sq m at Garlick’s Arch. A recent survey (Employment Land Needs Assessment 2015) shows it is not required. I understand that there is already a site that could be used at Slyfield that is more appropriate. In addition, Garlick’s Arch has an area of ancient wood that it is a crime to destroy. I understand the area is liable to flood as well.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/900  Respondent: 15248161 / Fabio Ligi  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the proposed new junction for the A3 at Burnt Common. The A247 to Woking will provide a short cut for many and this road is already at capacity. It is a minor road with cars parked on it and cannot take more traffic. All the proposed development will also increase traffic into Potters Lane where we live. This road is narrow and has an exit directly from the A3. It is already a dangerous road because traffic, including lorries, speeds down it from the A3 - it is a narrow twisty lane and is very dangerous to cyclists, pedestrians and motorists alike.

Please bear in mind the objections and concerns above and of the local residents. We live in an already busy and congested area and we are committed to maintaining the precious countryside around us. Please do not destroy our rural area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/898  Respondent: 15248161 / Fabio Ligi  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to building of 40 houses in Send Hill for the same reasons as above. The beautiful countryside will be ruined and the roads are far too narrow to facilitate more traffic. The travellers’ pitches are an impossibility due to the narrow access to the site. The proposed area is one we know well as we walk there almost daily. It is full of wild plants and is a haven for wildlife, as well as having quiet peaceful residential roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object that all this development will crush our local infrastructure in terms of housing, doctors’ surgeries, hospitals, and all other local amenities. How will we cope with all this additional pressure on services?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

This is to inform you of my objections to the new development plan for my village of Send, and the local area. I am a new resident to the area having moved here in 2015 and I am very concerned for the beautiful local area where I live with regard to the incursions into the Green Belt, the safety of moving around in this area, and for the considerable investment I had to make to live here. My objections to the plan include the following:

1. I object to the removal of Send from the Green Belt. The area in and around Send is rural and green and it provides a break between the urban areas of Woking and Guildford on either side. It is important for residents and future generations that this separation is maintained so that urban sprawl is kept under control in our area. I moved to Send in 2015 and had to pay a premium to buy a house here partly because of its location in the Green Belt. I was prepared to pay a premium for this reason but now it seems that my investment is threatened by a proposal to build considerable numbers of homes and industrial sites nearby. This will impact the area in many negative ways including increased traffic, fast traffic on narrow rural roads, pressure in existing infrastructure, to name three.
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<thead>
<tr>
<th>Comment ID: pslp172/2287</th>
<th>Respondent: 15248161 / Fabio Ligi</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy A42</td>
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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

**I object to the Policy A42 change at Clockbarn in Tannery Lane because:**

- The increase from 45 homes to 60 in this area is unacceptable. This is too many for our village to support. This is a beautiful area adjoining the river and is at present a narrow country lane and access is very restricted.

- GBC have not listened to residents who know that this will create traffic havoc on Tannery lane and the A247.

- Again the erosion of the Green Belt shows the disdain with which our local council views our village and its residents concerns.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: pslp172/2286</th>
<th>Respondent: 15248161 / Fabio Ligi</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy A58</td>
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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

**I object to Policy A 58 at Burnt Common because:**

- Again this will be in the Green Belt which must not be exploited. There is industrial capacity at Slyfield and Guildford and we do not need further sites, particularly on the GB.

- This proposed development was already deleted from the 2014 draft plan – it is obvious that local people are dead against this plan!

- The 2017 Employment Land Need Assessment shows also that there is no such requirement for 10 hectares of land to be developed, indeed it shows a reduced demand of 3.9 for the entire borough – there is no need to build on the Green Belt.
- Our roads cannot support the increased level of traffic. Our roads are narrow and some are country lanes. At present we find huge lorries mounting pavements, stuck down narrow lanes. This area is not appropriate for this kind of development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/905  **Respondent:** 15248257 / Michael Brown  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal in the local plan on the grounds that the 1963-68 Ordnance Survey maps of the proposed site mark it as 'refuse and slagheap'. It is therefore unsuitable for such a development on health reasons. I should know, I worked on these sites and I am now severely disabled with numerous health problems. I object to the proposal in the local plan on the grounds that the 1971 Ordnance Survey maps of proposed sitemap it a 'refuse tip' prior to when proper licensing/registration was required. The date of the landfill works predates the 1999 EU Landfill Directive regulations. I therefore believe that there is a danger that any disturbances would be a health hazard due to the unknown materials.

My friends in Australia live on an old goldmine and that was filled in with rubbish. A few of the family are suffering from tumors and one child is in recovery from leukemia.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPA16/603  **Respondent:** 15248321 / Gordon Pipe  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
Comment ID: PSLPS16/908  Respondent: 15248321 / Gordon Pipe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1845  Respondent: 15248321 / Gordon Pipe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1848  Respondent: 15248321 / Gordon Pipe  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

As a local resident in Ockham, I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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<td><strong>4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).</strong></td>
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<th>15248417 / Mary Pitkethly</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Horsley</td>
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<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
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<td><strong>As a resident of East Horsley I strongly object and am amazed that you are even considering destroying a area of Green Belt to build many more houses The local school is full already and the doctors’ surgery only just copes with the present number of Horsley patients</strong></td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3) I again most strongly object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/914  Respondent: 15248449 / Peter Bessler  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2) I also firmly object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

9) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2645  Respondent: 15248449 / Peter Bessler  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored. Further, it is an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity. It is the envy of the world and the proposals to raid these precious areas is nothing short of outrageous.

- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RH5 Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
  6. The lack of suitable public transport stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heath Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

- I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will
exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

• I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.

• I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

• I would point out that the number of new homes has been based on pre-Brexit projections for economic and population growth, including migration which now needs to be revised downwards, possibly quite seriously.

• Most of the borough's infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. The plan's commitment to build housing across the Guildford countryside will mean either major infrastructure investment, which no one will believe will happen and for which there are no funds, or else a catastrophic collapse in transport, educational, medical, energy, water and communication services.

• Finally I object to the proposal to build 533 houses on 6 sites in the Horsleys as it is plainly both excessive in absolute terms and disproportionate relative to the rest of the It will destroy the rural character of these communities.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/1857  **Respondent:** 15248449 / Peter Bessler  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

5) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
3. The congestion this traffic will cause on the narrow rural roads in these villages and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/1859  **Respondent:** 15248449 / Peter Bessler  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9) I object to the fact that the proposed plan does not meet the needs and desires of local communities. The top two responses as to why local residents enjoy life in these areas are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the
plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –
Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I write as a resident of East Horsley for over 43 years, and object to the draft Local Plan for the following key reasons:

1. **I most strongly object to a plan which proposes that over 70% of new housing be built within the Green Belt.**
   There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on
   protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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6) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in
relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of
Nature Conservation Interest (SNCI).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>10. I object to the proposed Infrastructure Schedule (Appendix C)</td>
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<tr>
<td>The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no schedule for Garlick’s Arch (A43), so the Plan takes no account of the infrastructure required for this site. It is therefore not fit for purpose.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Attached documents:</td>
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<th>Comment ID: PSLPA16/608</th>
<th>Respondent: 15248481 / Jamie McCallister</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>9. I object to the figure of 693 houses per annum in the borough being too high (Appendix D)</td>
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<td>With the recent Vote to Leave the EU, housing soon won't be an issue with 2.9 Million people leaving.</td>
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<td>The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans. How's that suddenly doubled????</td>
<td></td>
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<td>But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on the Plan.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
6. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch is protected from development as Green Belt. There are no exceptional circumstances which allow for it’s removal from the Green Belt (Policy P2). Central Government state clearly that housing need is not an exceptional circumstance.

The Plan states the preference is to use of previously developed land, but GBC have removed a brownfield site at Burnt Common replaced it with Garlick’s Arch.

The site is not appropriate because:
• There is no sustainable transport infrastructure.
• The site is liable to frequent flooding
• It has Ancient woodland and is a wildlife habitat, but no wildlife report for the site is in the Plan.
• There are no plans to improve local schools, medical or utilities to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/917  Respondent: 15248481 / Jamie McCallister  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

12. I object to the employment strategy and impact at Garlick’s Arch (A43) (Policies E2 and E5)

There is no need for new industrial sites at Garlick’s Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000 sq m proposed. That site was removed from the Plan without any reasoning.

Furthermore the development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been for there decades employing local people and are therefore clearly sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/915  Respondent: 15248481 / Jamie McCallister  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
5. I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)
How would the local roads cope, they are small roads with housing either side, how would a major junction on and off ramp work when there are just tiny roads feeding/exiting it?

North facing ramps to the A3 at Burnt Common would be a disaster for local communities, which do need to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic. E.g. all traffic from London/M25 to Woking would go through Burnt Common, Send and Old Woking. This is not sustainable as this cannot be improved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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8. I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)
The Garlick’s Arch (A43) proposal would double the built area in the locality, and would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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3. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)
There is too much traffic in our villages already and this plan will cause more congestion in Ripley, Send and Clandon, with no plan to improve that.

The rural roads in this area are narrow, in poor condition and have no footpaths. 5000 more houses means dangerous and unsustainable traffic.

How would Send, Send Marsh and Ripley cope with the extra traffic?
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1867  Respondent: 15248481 / Jamie McCallister  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

13. I object to the lack of proper infrastructure planning for sites (Policy I1)
The Plan does not identify adequate infrastructure improvements to support the huge scale of development, especially at Garlick’s Arch (A43) which has no infrastructure projects in the Infrastructure Schedule to support it. Local services, utilities and sewerage, doctors etc. are at or close to capacity.

There are no plans to improve the capability of the medical and police/emergency services to cover the 5000+ houses in the north east of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1868  Respondent: 15248481 / Jamie McCallister  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

14. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)
The A3 or M25 would have to be improved before any development is done. Highways England has no plans to even start considering improving the A3 before 2020. Clearly no real improvements are possible in the timeframe of this Plan so the developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), should not take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
11. I object to poor air quality concerns (Policy I3)
The huge developments being proposed, particularly in the north east of the borough will lead to considerable further congestion and to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

To whom it may concern,

I am writing to Guildford Council to express my great concerns on the proposed development of the Green Belt in Surrey.

What give's you the right to remove this land from the green belt?

The NPPF (National Planning Policy Framework) makes it clear that the fundamental aim of the Green Belt policy is to prevent urban sprawl by keeping land permanently open.

It also explicitly states that once established Green Belt boundaries should only be altered in exceptional circumstances.

There are no exceptional circumstances!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!

The whole point of the Green Belt is to stop urban sprawl, your destroying the Green Belt to extend urban sprawl? Insane!

Green Belt Guidelines enclosed as it's obvious you haven't read them.

The UK has voted to leave the EU, so 2.9 million people will be leaving soon, so no reason for all this devastation of the beautiful Surrey Green Belt.
These are pictures taken today of the land proposed to be taken out of the Green Belt for the Housing for Garlick's Arch.

[IMAGE 1]

[IMAGE 2]

2. I object to not protecting the Green Belt (Policy P2)
I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl.

There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

The Plan should develop the existing brownfield sites at Burnt Common rather than developing Garlick’s Arch (A43).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  📄 IMAGE 1.jpg (165 KB)
 📄 IMAGE 2.jpg (153 KB)

Comment ID: PSLPP16/1863  Respondent: 15248481 / Jamie McCallister  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4. I object to development in areas which are at risk of flooding (Policy P4)
The Plan does not take adequate account of flood risk as required by National Planning Policy.

The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan.

How can the Council's flood risk be low than the Environment agency's? We seen yearly flooding in the Garlick's Arch area! We leave near there.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1861  Respondent: 15248481 / Jamie McCallister  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the Local Plan as the development proposed is not sustainable (Policy S1)
13,860 new houses proposed is not sustainable and with the recent Brexit vote to leave the EU, not in anyway need – it will damage local communities by over development, gridlock traffic especially in Ripley, Send and Clandon.

The local communities don’t need these houses.

Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve the infrastructure for Garlick’s Arch.

The development should be in urban areas where there is sustainable transport such as Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

7. I object to the Borough Wide Strategy (Policy S2)
GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

The Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing.

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>pslp172/1374</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A34</td>
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I object to removal of Brownfield site (A34) from the Plan

Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. The Council’s claims to “have adopted a ‘brownfield first’ approach” (page 5) but this is clearly not the case, and is contrary to national guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1373  Respondent: 15248481 / Jamie McCallister  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to removal of Brownfield site (A4) from the Plan

Site A4 in Guildford has been removed. This is a perfectly good housing site, within the town centre and therefore with sustainable infrastructure, and would make use of a brownfield site that is in need of redevelopment. The Plan has removed housing from this site, in favour of commercial retail – thereby effectively substituting Green Belt land for retail development, which is totally unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1376  Respondent: 15248481 / Jamie McCallister  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the increase in housing proposed in Tannery Lane (site A42)

This has been increased by a third since the 2016 version of the Plan. This will have a significant impact on the already highly congested local rural road network around Send. This is in contradiction to section 2.14a of the Plan which states "Whilst most local roads are single carriageway, with a lane in each direction, it is at their junctions that the free flow of traffic is most often impeded during peak periods, in some cases resulting in significant delays." And yet there is no proposals to improve the local roads, only to add more junctions with the A3, thereby increasing congestion on the Trunk and Local road network.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1370  Respondent: 15248481 / Jamie McCallister  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the extended development in the Green Belt (Policy P2, Site A43)

I object to Garlick’s Arch (A43) being extended and the resulting urban sprawl. There are no exceptional circumstances for this site being removed from the Green Belt, as required by the National Planning Policy.

I object to the allocation of 6 Traveling Showpeople sites in A34 Garlick’s Arch

The allocation of 6 Travelling Showpeople plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan. There should be no inclusion of any Travelling Showpeople plots in A43 Garlicks Arch as this development site is for 400 homes and so is not compliant with the minimum of 500 in as stated in section 4.2.24 of the Plan.

I object to the potential and ill-defined increase in housing allocation at A43 Garlick’s Arch

The potential of an increase from 400 houses at site A43 Garlick’s Arch will be extremely harmful to the rural nature of the surrounding villages of Ripley, Send and Clandon and will cause coalescence of these villages.

The inclusion of site A58 Burt Common, removes the need for A43 Garlick’s Arch

GBC’s own reasons for including Garlick’s Arch A43 in the 2016 version were

The site [A43] location affords greater separation between Send Marsh/Burnt Common and the proposed site allocation at Gosden Hill Farm, … (site allocation A25) [than the Burnt Common site did]"

The site [A43] provides the employment floorspace needed in the plan to help meet identified needs”

Since A58 Burnt Common is now in the Plan (2017) the separation issue is clearly being ignored as BOTH sites (which are almost contiguous) are in the plan; therefore GBC are not following their own guidelines and objectives.

Since A58 Burnt Common is now in the Plan (2017) more than the “required” industrial space is available there, so there is no reason for Garlick’s Arch to be included.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1372  Respondent: 15248481 / Jamie McCallister  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the unfair imbalance of the Plan across the borough.

With the removal of site A46 from the Plan (with its proposed 1100 houses) and reductions of housing planned in this version of the Plan in other parts of the borough the Plan has become even more biased against the North East of the borough. Guildford Borough is over 100 square miles. Of the 11350 homes proposed in the Plan, 40.6% (4613) are within 3 miles of Send Marsh, most of them on Green Belt. This is grossly unfair on an already overcrowded part of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1371  Respondent: 15248481 / Jamie McCallister  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A50

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan is self-inconsistent in respect of traveller sites.
A50 Whittles Drive, Normandy, shows on the Site details: “Allocation: The site is allocated for approximately 14 Travelling Showpeople plots ...” Clearly A50 more than covers the total "need" of 8, (page 40, 4.2.22.) and so no “need” exists for this in site A43. This and other inconsistencies in the Plan mean no decision can be made on the basis of this document.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1375  Respondent: 15248481 / Jamie McCallister  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal for a Waste Management Facility in Green Belt (A58)

The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned, obscurely in policy 4.423a, and does not allow for full and proper consultation. These facilities are always highly contentious and the Council has a duty of transparency in this regard which it is, at best, neglecting.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/331  Respondent: 15248481 / Jamie McCallister  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the hiding of development by “deferment” (A24, A25, A26, A43)

This version of the Plan has concealed some development planned to take place by “deferring” it beyond the period covered by the Local Plan. This is designed to have 2 effects:

i) to hide the number of houses actually being built (A24, A25, A26 – total of 1100 deferred, but still being built!), and

ii) give an excuse for building houses on another site (A43 – 400/650 houses proposed) when they are not needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/330  Respondent: 15248481 / Jamie McCallister  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object the change in policy on affordable homes (Policy 4.2.23)

The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”.

The 2017 version says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.”

So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.

Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses].” That has now been removed, thereby accepting that needing to make greater than normal profit is to be an acceptable reason not to deliver affordable homes. This is a shocking sop to the developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/329  Respondent: 15248481 / Jamie McCallister  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of proper infrastructure planning for sites (A43 and A42)

The Foreword to the plan by Paul Spooner includes on page 5:

“We recognise that significant infrastructure upgrades are required to support existing communities and the planned growth of the borough. The delivery of sites allocated in this plan is contingent upon the provision of new infrastructure, which is a key theme of our Local Plan”.

The lack of any plan for either physical or green infrastructure improvement clearly contradicts this in respect of both A43 Garlicks Arch and A42 Clockbarn Nursery, Tannery Lane, Send. Development of these sites without the contingent infrastructure would therefore be contrary to the stated aims and themes of the Plan, and should not go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/918  Respondent: 15248609 / T Powell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal in the local plan on the grounds that both the Envirosearch report RS1100201_1_1 dated 17th February 2004 and historical map data and information from GBC has identified site as landfill and has "areas of potentially contaminative industrial activities". Development of this site would be a health hazard. The recent reports of a child dying from seepage of contaminated ground following flooding prove that developing any such sites is a danger to health. Send is surrounded by old gravel pits that were filled in in the late 50's early 60's. The Daily Mail has also recently had an article on how the dangers of living near a landfill site raises cancer concerns. The paper referenced a study published by the International Journey of Epidemiology which tracked 242,000 people living near landfill sites in Italy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2691  
Respondent: 15251105 / Michael McGrath  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I, my family and many friends, will be directly affected by the many negative impacts that will arise if your local plan as it affects the communities of Send, Send Marsh and Burnt Common, is adopted.

I have a number of objections to your local plan and these are covered in the attached signed scanned copy of my letter to your Planning Policy Office, that I have highlighted “TO BE READ BY THE PLANNING INSPECTOR”.

I would appreciate, by reply to this email, your acknowledgement of the receipt of this email and the attached letter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4065  
Respondent: 15251105 / Michael McGrath  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object the change to Policy A42 because:

- This is a 33% increase on the original proposal (to which I and many hundreds of residents of Send have previously objected to) and would be even more inappropriate for reasons including increasing urbanisation, leading to unreasonable stresses on existing transport infrastructure and services, and the lack of any additional capacity for the local GP Centre and the newly amalgamated Send School.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the Policy A43 change because:

- It disregards the overwhelming number of previous objections from local residents which have been ignored.
- The inclusion of pitches for travellers and showpeople is contrary to any proven evidence that there is a demand for such facilities in the foreseeable future.
- The land at this location is Green Belt and must be retained to prevent increasing urbanisation and to preserve the natural habitat of ancient woodland and allow biodiversity to function alongside built-up environments.
- The area has high levels of existing vehicle movements along the A3, A247 and B2215 routes and any reduction in green spaces reduces the opportunities for atmospheric CO2

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/4066  Respondent: 15251105 / Michael McGrath  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Comment ID: pslp172/4067  Respondent: 15251105 / Michael McGrath  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the Policy A58 change with a proposed “minimal” allocation of industrial or warehousing space because:

• A “minimal” allocation is open-ended and exposes the land to unknown future development encroachment, where such a proposed allocation already breaches the law which is meant to prevent local authorities allowing building on Green Belt unless special circumstances exist.

• No special circumstances exist to encroach upon this area of Green Belt and remove it forever, as the ‘2017 Land Needs Assessment’ shows a reduction of 3.9 hectares of industrial land being required for the whole of Guildford Borough.

• The proposed allocation of over 10 hectares of industrial land at this location is contrary to the reduction mentioned above.

• There is no justifiable case for creating more industrial units in Send when Guildford, including the dedicated commercial site at Slyfield, have vacant sites.

• The proposed additional industrial space at this site would worsen the already overburdened A3 and M25 traffic flows in the area where Highways England have no funded plans to increase vehicle capacity on these major routes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2196  Respondent: 15251105 / Michael McGrath  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. COMMON OBJECTIONS TO POLICIES A42, A43, A58 & GREEN BELT, POLICY 2 AT PARAGRAPH 4.3.15

I object to the changes to these Policies because:

• Any additional houses and other developments in Send would increase the urbanisation of what is a semi-rural area protected by Green Belt from the closeness of the already built-up Woking Borough.

• The proposed number of new houses and other land appropriation for development adds to what was already an over-development of the area and is a disproportionate allocation of land in the Send Ward within the Borough of Guildford.

• Further developments in the Send Ward will worsen the already chronic problem for vehicle parking for people using the recreational and shopping facilities in Send.

• The prospect of yet more vehicle traffic being added to the minor ‘A’ road (the A247) through Send as this already has high volumes of traffic where the 'uktrafficflow' web site shows an average of nearly 14000 vehicles passing along the A247 in Send each day, which has an adverse effect on the quality of life for the residents of
Send with congestion, noise, and pollution from vehicle emissions, afflicting the lives of residents. This daily high traffic flow is excessive and must not be increased further by senseless developments.

- There are no commensurate plans or funding to increase the provision of water storage and supply to additional households and commercial facilities in the Affinity Water region, to avoid water shortages in future years.

I object to this Policy change to inset Send Business Park from the Green Belt because:

- The Business Park is an anachronistic legacy which has been allowed to develop in an area of public amenity countryside (adjacent to the unique National Trust property that is the Wey Navigation) which should be not be allowed expand further and destroy the Green Belt and impact upon the amenity value and natural biodiversity of the area forever.

- Such expansion is entirely inappropriate in any event because of the highly restricted nature of Tannery Lane.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/619  Respondent: 15253217 / W Orchard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick's Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/621  Respondent: 15253217 / W Orchard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan's proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPS16/932  Respondent: 15253217 / W Orchard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of the land at Garlick's Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick's Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick's Arch site. There was no proper consultation in relation to the inclusion of this site.

Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy 13).
The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4). This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy 14).

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy 11).

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/934  **Respondent:** 15253217 / W Orchard  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of 'through' traffic.

The route from London/M25 to Woking of would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/1894  **Respondent:** 15253217 / W Orchard  **Agent:**
I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3).

I object to the local plan based on the impact it will have on the special countryside of the borough. The proposed development at Garlick's Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick's Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site. The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1 c), general industrial (B2) and storage and distribution (B8) at Garlick's Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick's Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
| Comment ID: PSLPP16/1893 | Respondent: 15253217 / W Orchard | Agent: |
|--------------------------|---------------------------------------------|
| **Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

I object to the location for new employment floorspace at Garlick's Arch - Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and 88) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick's Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

| Comment ID: PSLPP16/1897 | Respondent: 15253217 / W Orchard | Agent: |
|--------------------------|---------------------------------------------|
| **Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

I object to the loss of rural employment (Policy ES) Policy ES supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick's Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1).

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages.

The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces. Many of the affected villages, such as Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

With some 5000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle Lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick's Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents' in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick's Arch site.
Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services. Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to poor air quality concerns (Policy 13)

Paragraph 4.6.27 of the Plan states that "Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health." The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1883  
Respondent: 15253217 / W Orchard  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to not protecting the Green Belt (Policy P2)

I object to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick's Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1888  
Respondent: 15253217 / W Orchard  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough's identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick's Arch (A43) is identified on the Environment Agency's flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council's SFRA as a Flood Zone 2 - having between a 1% and 0.1 % annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be recommissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1881  Respondent: 15253217 / W Orchard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I object [very strongly] [in the strongest possible terms] [wholeheartedly] to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan.

1. I object to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over development, particularly for the villages between Guildford and the M25,
including Ripley, Send and Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35) and Garlick’s Arch (A43) are in unsustainable locations. They do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1882  Respondent: 15253217 / W Orchard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Glandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to the proposed Guildford Borough Council Local Plan, particularly the aspects of the plan that propose removing Green Belt status from Send and Ripley, and building residential and industrial sites (elements A42, A43 and A44), for a number of reasons.

I object, as large parts of Send and Ripley are built on low-lying land that is prone to flooding; building houses, roads or other developments as part of this plan could affect the delicate balance of drainage, and adversely affect all parts of Send and Ripley.

I object, as the current road network in Send and Ripley is quite small, compact, and highly-dependent on the A247 for access to both Woking and Guildford. Any increased development in the area will put more pressure on this road. This road has a number of constrictions, both buildings and waterways, so will be bottlenecks and cause gridlock in the area. Development of the Send Hill site (NUMBER) in particular will place huge pressure on the narrow roads of Send Hill (which is built-up on both sides, with no scope to widen it) and Potters Lane, particularly where they each join the A247 northbound to Woking. Sections of the A247 to the south of Send Hill, on Send Barn Lane, are already prone to partial flooding during heavy rain.

I object, as there are no plans to improve public transport in the area. There are no local railway stations, and the current bus services to Guildford and Woking are very infrequent and expensive; residents in the proposed new houses would be forced to use cars to travel and to commute, putting increased pressure on the roads in the area.

I object, as the plans for industrial estates would adversely affect the area; there would be increased traffic, particularly from HGVs (for which the road network is completely unsuitable), adversely affecting current residents. Industrial sites are just not in keeping with the quiet, rural character of Send and Ripley.

I object, as all of the proposed sites are currently green fields and woodland. I have seen deer, rabbits and other animals on these fields, particularly the site opposite Send Cemetery which has proposed developments, and can not understand why these areas are even being considered for building upon.

I object, as the proposed changes will change the character of Send and Ripley forever. They are tranquil, rural villages, not busy towns; if the residents wanted to live in busy, congested towns, they would not have moved to Send or Ripley. Changing the nature of these villages would be unfair to the current residents. Once Green Belt protection has been removed from these areas, there will be nothing to stop even more development, and they will just become part of the urban sprawl of Guildford and Woking. Is the requirement for further housing in the area more important than protecting the Green Belt?

I object, as there are no clear plans to use the current brownfield sites. Guildford Council should have a register of available brownfield sites; using these would be preferable to eating into precious Greenbelt land.

I object, as the increased traffic and industrial activity will lead to increased pollution (both noise and atmospheric), again this is unfair to the residents who had selected, and expected, a quiet, rural environment.

I object, as there are no plans for increased provision of medical facilities, or schools / colleges, for the extra families who would be living in the proposed new homes. Having moved recently from central Woking to Send, I can personally attest to the effect that the pressure of increased population can have; increased pressure upon local primary schools, waiting a month for a GP’s appointment. Has the effect of the increased population upon current residents been considered?
I object, as some of the proposed areas (particularly Send Hill) have not been included in previous proposals, and so it has not been possible for residents to be consulted with regards to developments in these areas.

I object, as the proposed developments in Send and Ripley account for almost half of all the housing in the current development plan; it seems unfair for Send and Ripley to take such a large proportion of the new homes for the whole of Guildford Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1884   Respondent: 15253313 / J.J. Maguire   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the new local plan as follows

1. I object to the increase in the volume of traffic that so many new homes will generate.

1. I object because the train services at peak times will be overwhelmed. As it is one just about gets a seat at Horsley. By the time the train gets to Effingham and Cobham it is standing room only.

1. I object because the infrastructure proposals are inadequate. Where are the new roads going to come from?

1. I object because the medical services will be under increased strain. It is difficult getting a doctors appointment as it is.

1. I object because the parking at the railway station will be overwhelmed.

1. I object because the parking provision at the village centre will be unable to cope.

1. I object because local schools will be unable to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1887   Respondent: 15253313 / J.J. Maguire   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object because of the **compound effect of development** on so many adjoining villages. What I have seen does not properly accommodate this. Bottlenecks will be created. Look at the situation when the utilities dig up OR north or OR south. The detour when the bridge was out of action was along roads that were unsuitable. Plus locals used roads like The Drift causing misery to local people.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/1885  **Respondent:** 15253313 / J.J. Maguire  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

1. I object to the **loss of habitat** for wild animals. I have observed a decrease in the years (28) that I have lived here. Development on the scale that is proposed will put further pressure on the fauna.

1. I object because of the **pollution** that so much additional traffic will generate. I have **asthma** and moved out of London to improve my health. This increase in vehicle emissions will be bad for my health.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/1886  **Respondent:** 15253313 / J.J. Maguire  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
1. I object because of the issue of flooding. We are on clay and water is slow to drain away. The ditch in front of my house is in full spate at least once every winter. The water hits the bridge and fountains 3ft into the air. The surface water is at times intolerable for pedestrians. I fear that run off from more buildings will lead to flooding.

1. I object because in nearly 30 years living in our house we have never been flooded. But if so many houses are built behind us I fear that the risk of flooding to peoples homes will increase.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPA16/672</th>
<th>Respondent: 15253409 / Rupert and Sara Trevelyan</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Gomshall</td>
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Policy P2

We support proposed Policy P2 which allows limited infilling in the Green Belt within the identified settlement boundaries of villages including Gomshall.

Paragraph 84 of the NPPF states:

"When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary".

Gomshall is a sustainable location, given its existing access to sustainable public transport (buses and railway station) and a number of local services within the village including a village hall, public houses and local shops. It is considered that Policy P2 which allows for infill development within the villages washed over by the Green Belt is in accordance with Paragraph 84, as it will direct development to sustainable locations, such as Gomshall.

We note that the Council has provided a definition of limited infilling in paragraph 4.3.26, which provides three circumstances which would be defined as limited infilling:

- Development of a small gap in an otherwise continuous built-up frontage;
- Small-scale redevelopment of existing properties within a built-up frontage; and
- The infilling of small gaps within built development.

We suggest that the third criteria is reworded to read 'the infilling of small gaps within the identified settlement boundary'. The re-wording of this policy would confirm that development within the settlement boundary is acceptable in principle and would be in accordance with the NPPF's presumption in favour of sustainable development, given that Gomshall village is a sustainable location for development.
We support the amendments to the proposals map for Gomshall and the amended identified boundary for the village which now includes the whole of the residential curtilage of Weybrook. It is considered that the proposed boundary is in accordance with paragraph 85 of the NPPF which states that when defining boundaries, local planning authorities should define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

As noted above, the site is in a highly sustainable location, proximate to services and facilities within Gomshall and as such it is considered to be an appropriate location for small-scale, residential development within the identified settlement boundary. The large undeveloped area to the rear of the existing dwelling offers an opportunity to provide infill, residential development in a sustainable location within the borough.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPA16/676</th>
<th>Respondent:</th>
<th>15253409 / Rupert and Sara Trevelyan</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Gomshall</td>
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The whole village of Gomshall is washed over by the Green Belt, however, we consider that the land to the rear of Weybrook is suitable for development and does not meet the five purposes of the Green Belt set out in paragraph 80 of the NPPF:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

We set out our justification for the suitability of the site for development below.

Firstly, the site does not check the unrestricted sprawl of large built-up areas. Gomshall lies around 10 km to the south-east of Guildford and is therefore distinct from large built-up area. The site itself is to the north-east of Gomshall, beyond which is open countryside with some agricultural premises. The land to the rear of Weybrook does not check the unrestricted sprawl of a large-built-up area and therefore does not meet the first purpose of the Green Belt.

Secondly, Gomshall remains distinct from the surrounding villages of Shere (to the west) and Peaslake (to the south). As noted above, to the north of the site is open countryside and there are no neighbouring towns for some distance, as such it is not considered that the site meets the second purpose of the Green Belt.

Thirdly, the Green Belt seeks to safeguard the countryside from encroachment. The site is within the residential curtilage of Weybrook, to the rear of the Tillings cafe/restaurant and now within the proposed settlement boundary for Gomshall. The site is not a countryside location and therefore it is not considered that the site meets the third purpose of the Green Belt.
Fourthly, it is the purpose of the Green Belt to preserve the setting and character of historic towns. The Council has not specifically noted the historic character of Gomshall, the village has not been designated as conservation area and as such it is not considered that the Green Belt in this location fulfils this purpose of the Green Belt.

Fifthly, the Green Belt should assist in urban regeneration by the recycling of derelict and other land. Given the scale of the site it is considered that any development will meet a need for housing within the rural area of the borough, close of public transport links. The site is not of sufficient scale to impact the regeneration of urban sites within the borough.

We would be grateful for written confirmation that these representations have been received and duly made, as part of this consultation exercise. We would be happy to discuss proposals for residential development at Weybrook, Gomshall in due course.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
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We are the owners of [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998], which consists of a single dwelling house with a large undeveloped area to the rear. The site is located within the village of Gomshall with the United Reformed Chapel to the west of the site and the Tillings cafe to the east. The site is located approximately 350m to the west of Gomshall Station and is surrounded by local services.

Policy S2
The proposed borough housing target of 13,860 (or 693 per annum) exceeds the housing need for Guildford as set out in the West Surrey Strategic Housing Market Assessment of 517 homes per annum. It is considered that the housing target is in accordance with paragraph 159 of the NPPF.

We note that Table 1 projects a net increase of 431 homes within inset villages and infill development within identified Green Belt villages between 2018 and 2033 and additionally 625 homes to be delivered through windfall development. We support the inclusion of small sites and infill sites within Green Belt villages as the Council's Land Availability Assessment (February 2016) confirms that in the past the majority of housing supply in the borough has been delivered on small windfall sites.

Paragraph 47 of the NPPF confirms that local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5%.

We support the Council's inclusion of small sites within the proposed delivery strategy and consider that the land at Weybrook, Gomshall could provide a small-scale residential development to contribute to the Council's housing supply within the next 5 years. Although, the Local Plan proposes several large housing allocations it is considered that small windfall sites will...
continue to have a role in the borough's housing supply, particularly in the early part of the plan period as the large strategic sites will have longer lead-in times before housing can be delivered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/925  Respondent: 15253473 / Amanda Brackley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed plan to build on Blackwell Farm.
Save our green fields and trees for us and the wild life.
There is enough traffic clogging up Guildford now....
We live in a beautiful part of the country please dont ruin this precious land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/614  Respondent: 15253537 / Marie-Ann Hillier  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing with regard to final draft local plan, and the objections I have to it.

1) I object to you trying to remove send from the green belt, why remove land that is used by wildlife and locals and acts as a water catchment when it rains, and replace it with concrete? This would be bad socially and environmentally, why ruin such important areas just for money?

2) Similarly I object to you planning to build on garlick's arch, burnt common, again I have environmental concerns, for the existing wildlife, and water catchment and also levels of air pollution, from the massive increase in traffic and builds in the area. Also why add more industrial units, when they are just not required? Lastly, you have not even consulted upon this site and this new massive junction, does the council feel it doesn't have to follow the correct consultation processes?

3) I object to your plans for the land west of winds ridge, again you are trying to skip the consultation process and ruin the green belt. Why kill wildlife, ruin the rain catchment and try to wedge too many houses in an area, with a tiny access road,
which will get congested and polluted. There is also the issue of if the build went ahead, the site has been previously used for landfill, which could possibly lead to future problems for the people who purchase the housing. Lastly why build two travellers pitches, we have no travellers in send, so why would you need to build pitches which are surplus to requirement, plus they would have the same problems as the housing - unsuitable narrow access and existing landfill pollution.

4) I also object to the fact the council has no sound evidence to prove send etc needs all that industrial building, or that amount of homes, where would you find the businesses or people to use all these buildings? Brownfield sites would be a much better option, there would be existing infrastructure, you wouldn't be killing wildlife or ruining the water catchment and the land is already concreted, so it would be better to regenerate the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**A22 proposed building on land north of Keens Lane Guildford.**

Keens Lane has recently been developed by the creation of Sime Close and Morgan Close.

Keens Lane itself has not had any infrastructure improvement for vehicular movement from Keens lane onto Worplesdon Rd, nor where traffic join Aldershot Rd from Gravetts Lane.

An additional 140 homes would see another 280 vehicles using this area on a daily basis. Significant alterations would be required to the road network. this would not be in keeping with the current environment.

i object to the suggestion of building homes on this green belt site.

this would be to the detriment of local amenities enjoyed by current residents,

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1</td>
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<td>4) I object to the SHMA housing figures – they are too high</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1</td>
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<td>7) I object to the impact these developments will have on neighbouring areas such as Pyrford, which has not been taken into account.</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1</td>
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<td>5) I object to lack of protection for heritage and environmental assets</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

6) I object to the obsession with economic growth over quality of life which will blight the areas proposed for development

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1916  Respondent: 15253889 / Carole Gale  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to any removal of green belt land
2. I object to ‘in-setting’ of any villages from the green belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/381  Respondent: 15253889 / Carole Gale  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3) I object to the limited consultation period

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/622  Respondent: 15253953 / Olivia Bedworth  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

GBC Local Area Plan for Ripley, Send and Clandon

Please see below the objections I have to the current plan mentioned above. I believe that the current plan is simply not fit for purpose. Below I set out why I believe this to be the case:--

1. I object to the lack of consideration of infrastructure improvements. It does not make any sense to have a plan that effectively merges all villages along the A3 from Wisley to Blackwell Farm. In order to make it sound, very significant infrastructure improvements would need to be made, including, but not restricted to, completely rebuilding the A3/M25 intersection to make it freer flowing and an additional lane to be added to the M25 in either direction. The A3 through Guildford would need to become 3 lanes too, and the junction with the A31 Hog’s Back significant altered/improved.

2. I object to the limited consultation period. The impact of the proposal on the locality is so high that further consultation is necessary.

3. I object to the process. The correct process has not been followed: Regulation 18 should have been followed bearing in mind the significant changes that have been made to the plans, more widely, and specifically at Burntcommon, (Garlick’s Arch policy A43), and at land west of Winds Ridge and Send Hill (A44). My understanding is that this invalidates the whole process.

4. I object to the situation being labelled as “exceptional”. There is nothing exceptional about the current situation, and if anything, the Brexit vote should put all development on hold until its impact can be fully assessed. The demand for housing may fall if there is a resulting reversal in immigration trends, and foreign student choosing to come to the UK, for example.

5. I object to the disproportionate amount of development in one part of the borough.

6. I object to the villages of Send, Ripley and Clandon being removed from the Green Belt. Send provides a buffer between Guildford and Woking. None of these villages should be “inset”. The better use of Brownfield sites must be fully explored and exploited.

7. I object to the provision of sound evidence. The reduction in ELNA of 80% since the 2013 survey means that the need for industrial space at Burntcommon is no longer present.

8. I further object (following on) to the plans being based on insufficient evidence of future housing needs. Again, with reference to the huge potential of the Brexit decision.

9. I object to only 2 weeks’ notice being given for the inclusion of new sites in the plan.

10. Finally please explain why the inclusion of 2,000 homes at Wisley is still in the plan despite earlier rejection by the GBC on the grounds that they are unsuitable. This gives me no confidence that a logical and valid process is being followed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Clockbarn Nursery, Tannery Lane, Policy A42 I object to the Policy A42 change at Clockbarn in Tannery Lane because:

- The plans have increased from 45 homes to 60 homes which is 33% and this is far too much for local infrastructure
- It ignores all the thousands of previous objections made by local people
- It will increase surface water flooding, which is already a problem and is increasing with further development
- It will impact on the open countryside views from the River Wey Navigation
- It will cause erosion of the Green Belt in our village
- It will increase problems with the traffic in Tannery Lane and at the A247 junction

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

Land at Garlik’s Arch, Send Marsh, Policy A43 I object to the Policy A43 change at Garlick’s Arch because:

- It ignores all the thousands of previous objections made by local people
- The is no proven demand for Travelling Show people plots in this location
- It is subject to frequent flooding and is currently a flood zone 2 allocation
- It is contaminated by lead shot accumulated over 50 years
- It will generate excessive traffic that will block up the local roads of Send and Ripley It is beautiful permanent Green Belt and no ‘exception circumstances’ exist
- It will cause overdevelopment of our village and the number of homes is excessive
- It will join up Ripley and Send and defeat the key purpose of Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Land at Burn Common, London Road, Policy A58 I object to Policy A58 at Burn Common because:

- It was deleted from the 2014 draft because of all the objections made previously
- The word ‘minimum’ is a change from the previous ‘maximum’ in the 2016 plan and since that time there has been a decline in the demand for industrial land
- There is no need to build industrial or warehouse developments in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units
- The impact on small surrounding roads will create traffic gridlock
- It will join up the existing villages and defeat the purpose of the Green Belt
- The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1737  Respondent: 15253953 / Olivia Bedworth  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Green Belt, Policy 2 at paragraph 4.3.15 I object to the proposal to inset Send Business Park from the Green Belt because:

- It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate
- There is highly restricted vehicular access along Tannery Lane in both directions

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4135  Respondent: 15254049 / Strutt & Parker LLP (John Smith)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Former Wisley Airfield

Page 485 of 2804
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

RE: Land to the North of Ockham Lane, Ockham

Guildford Borough Council Proposed Submission Local Plan: Strategy and Sites – Regulation 19 Consultation

Introduction

These representations have been prepared on behalf of our client, Mr Woolfgang and Mrs Paula Matthews, in relation to the land North of Ockham Lane, Ockham (hereafter referred to as ‘The Site’) which lies within Mr & Mrs Matthews’ ownership.

These representations have been prepared in response to the Guildford Borough Council Proposed Submission Local Plan. Mr & Mrs Matthews seeks to engage positively and constructively in the plan-making process in Guildford Borough. In these representations we comment on the following matters:

• The requirement to objectively assess new housing needs, and the need to review the Guildford Green Belt;
• The A35 strategic proposals; and
• The potential for a standalone housing allocation at Ockham Lane

Mr & Mrs Matthew’s land ownership is identified on the attached land ownership map at Appendix A. The site is bounded to the west by Hatch Lane, beyond which is residential land; to the east by a driveway leading to a dwellinghouse and farm buildings; and to the north by a farm beyond the existing boundary.

The site is situated in fairly close proximity to Guilford town centre, and benefits from good railway links, with Effingham Junction Train Station located just over 2 miles from the site providing a direct service to London Waterloo and Guildford stations. It is also situated just over one mile from the A3 via car.

Housing Need and the Green Belt

The submission is made on the basis of broad support for the Council in preparing a revised Local Plan which has been necessary in order to meet the requirements of the National Planning Policy Framework (NPPF), which states that Local Planning Authorities (LPAs) should positively seek opportunities to meet the objectively assessed development needs of their area. There are potentially significant implications for the Council if it does not have an up-to-date Local Plan, as it will become more susceptible to speculative planning applications. As highlighted by the Housing and Planning Bill, local authorities are required to have a Local Plan in force by March 2017; otherwise applicants will be able to submit planning applications directly to the Secretary of State for determination, and in addition the Secretary of State will have the power to prepare Local Plans for these LPAs.

In accordance with the NPPF and NPPG requirements the Council, in preparing its Local Plan, must first identify the objectively assessed need for the local area. In this regard, Mr & Mrs Matthews support the Council’s intention to identify a plan to deliver what it considers to be its current objectively assessed local need of 693 homes per annum. As set out within the NPPG ‘Household projections published by the Department for Communities and Local Government should provide the starting point estimate of overall housing need’ [Reference ID: 2a-015- 20140306]. We initially note that the recently released (July 2016) 2014-based DCLG Household Projections highlights a national increase to 214,000 households per annum over the period from 2012 to 2037, up from 210,000 in the 2012 projection. Furthermore, the most recent
2014-based household projections for Guildford now average 570 per annum in the plan period 2013 – 2033, compared with the demographic need in the SHMA, derived from the 2012-based household projections of 517 per annum in this period.

In addition, it is significant that the London Plan (2015) indicates that a minimum of 42,000 dwellings per annum is to be met in Greater London, although the 2013 Strategic Housing Market Assessment (SHMA) identifies a need for 49,000 (2015-2036) per annum. Pertinently, the Inspector in finding the FALP sound, called for wider engagement with local planning authorities beyond the GLA’s boundaries (which could include Guildford for example), in accommodating the Capital’s growth.

In summary, we note there remains robust and increasing need for housing within the region but acknowledge that Guildford as a Borough is heavily constrained by Green Belt, particularly within the eastern part of the Borough. Green Belt boundaries should only be reviewed in exceptional circumstances by LPAs when reviewing Local Plans, as established at Paragraph 83 of the NPPF and in this respect Mr & Mrs Matthews welcomes the Council’s commitment to review Green Belt boundaries in recognition of the Council’s consideration of its identified housing need. Accordingly, we would highlight our support for the proposed removal of The Site from the Green Belt, as proposed within the draft Policies Map.

Comments on Policy A35– Wisley Airfield

We would like to take this opportunity to confirm our support for this draft allocation, which provides the strategic level of growth required to make a significant contribution to the Council’s proposed housing targets, as well as providing associated infrastructure to accommodate this level of development.

We welcome the positive and pro-active approach taken by the Council to planning to meet what it considers to be its development needs, as required by the NPPF.

Land to the north of Ockham Lane– Standalone Allocation

Notwithstanding the above, we are also promoting The Site as a standalone allocation.

Firstly, we note that The Site has now been included within the Wisley Airfield Allocation which confirms that the Council considers The Site can perform a housing delivery function. However, the site is also considered suitable for allocation for housing in its own right, irrespective of the wider proposals at Wisley Airfield, for the following reasons:

• As recognised by the Sustainability Appraisal for the submission draft Local Plan, the wider site for Policy A35 performs well as a location for growth, noting that it avoids the need to place pressure on landscapes designated as being of larger-than-local importance or the most sensitive Green In this respect, we note that the site (located within area C18 of the Green Belt and Countryside Study by Pegasus Planning Group in 2013), was considered to meet only two of the Green Belt purposes set out at Paragraph 89 of the NPPF.

• The Green Belt and Countryside Study highlights that Potential Development Areas have been identified as potentially suitable to accommodate new development, located to the north of Ockham (sites C18-A and C18-B) which is in close proximity to The Site. Whilst these two land parcels at sites C18-A and C18- B do not include The Site, we would highlight that they share very similar characteristics with it, in terms of capacity, location to the north of Ockham Lane and containment by existing buildings, and with very similar access to local services and transport links. In this respect, the site would be capable to delivering up to 50 dwellings as part of a suitable extension to the existing settlement at Ockham, which features a number of existing services, and access to the strategic road network, with the A3 and M25 in close proximity. The development could make a significant contribution to the Council’s housing requirements (potentially including affordable housing requirements), and make financial contributions to the provision of Suitable Alternative Natural Greenspace. Any development would be high quality, and would be designed sensitively with due regard to the proximity to the nearby Conservation Area.

• As identified by the assessment of the Potential Creation of a New Settlement at Wisley Airfield, the proposed Wisley Airfield site would provide the opportunities to deliver permanent and defensible Green Belt boundaries, including at The Site adjoining Ockham, in accordance with NPPF In addition, the Green Belt and Countryside
Study also confirms that land parcel C18 provides an opportunity to accommodate appropriate development without significantly compromising the purposes of the Green Belt.

- We note the airfield had been subject to a planning application, which was refused in April 2016 and which The Site did not form part of (LPA ref: 15/P/00012). However, the comments within the assessment of the ‘Potential Creation of a New Settlement at Wisley Airfield’ identifies that the southern parts of the draft A35 allocation, within which The Site is located, are the least environmentally sensitive
- The site fronts onto Ockham Lane so there are opportunities for provision of a suitable access. The site is entirely within Flood Zone 1 so is appropriate in flood risk terms.
- The site is deliverable and developable in the short, medium, or long term.

In summary we welcome the inclusion of draft allocation for Policy A35 and removal from the Green Belt, for which Mr & Mrs Matthews’s land is included. However, for the reasons set out in this letter it is considered that Mr & Mrs Matthews’ site to the north of Ockham Lane is also suitable for an allocation in its own right and should be considered on this basis.

Thank you once again for the opportunity to respond to the Council’s Proposed Submission Local Plan consultation exercise. We would be very grateful for confirmation that these representations have been received.

Mr & Mrs Matthews respectfully requests that the Council notifies Strutt & Parker, on its behalf, of the future arrangements for the Examination of the Local Plan. Moreover, Mr & Mrs Matthews wishes to take this opportunity to formally request the right to appear at all stages of the Examination in Public.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: rsgdgdff.png (71 KB)

Comment ID: PSLPA16/632  Respondent: 15254113 / R Orchard  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 

Comment ID: PSLPA16/635  Respondent: 15254113 / R Orchard  Agent:
| Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): (*)**

I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan's proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors. trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPS16/942  Respondent: 15254113 / R Orchard  Agent: |

| Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A43 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): (*)**

I object to the location for new employment floorspace at Garlick's Arch - Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B 1 c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick's Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to the inclusion of the land at Garlick's Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick's Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (82) and storage and distribution (88). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick's Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).
The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy 14)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy 11).
Furthermore, several electricity pylons run through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of 'through' traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through Glandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I object to the local plan based on the impact it will have on the special countryside of the borough. The proposed development at Garlick's Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1934  Respondent: 15254113 / R Orchard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick's Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick's Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick's Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1935  Respondent: 15254113 / R Orchard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick's Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1937  Respondent: 15254113 / R Orchard  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy 11)
Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages.

The Plan does not provide an achievable strategy for improving capacity on these local roads. Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

With some 5000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1938  Respondent: 15254113 / R Orchard  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
I object to the lack of proper infrastructure planning for sites (Policy 11)

Policy 11 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick's Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents' in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick's Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1939  Respondent: 15254113 / R Orchard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy 12)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to poor air quality concerns (Policy 13)

Paragraph 4.6.27 of the Plan states that "Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health." The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to not protecting the Green Belt (Policy P2)

I object to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick's Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.
I object to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough's identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding. The site at Garlick's Arch (A43) is identified on the Environment Agency's flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council's SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be recommissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I object [very strongly] [in the strongest possible terms] [wholeheartedly] to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan.

1. I object to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over development, particularly for the villages between Guildford and the M25, including Ripley, Send and Glandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35) and Garlick's Arch (A43) are in unsustainable locations. They do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Glandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill
(Glandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/623  Respondent: 15254305 / Ben Barnwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/936  Respondent: 15254305 / Ben Barnwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
10) I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1925  Respondent: 15254305 / Ben Barnwell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1927  Respondent: 15254305 / Ben Barnwell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4
8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1926  Respondent: 15254305 / Ben Barnwell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1921  Respondent: 15254305 / Ben Barnwell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1924   Respondent: 15254305 / Ben Barnwell   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3725   Respondent: 15254305 / Ben Barnwell   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I would like to express my objection to the proposed policy A35, Three Farm Meadows in the draft local plan for several reasons:

1. The plan is a gross misuse of Greenbelt land whose very purpose is to stop the environmentally unsustainable and detrimental expansion of city areas at the cost of natural green space.
2. The local roads would not be able to sustain the increase in traffic. The A3 and M25 junction is already incredibly congested at all times and the country roads are narrow and dangerous. In recent months there have been multiple accidents at the Old Lane – Ockham Road crossroads.
3. The roads are not wide enough for the new suggested bus routes
4. I find the proposal for walking and cycling on these routes absurd and unbelievably dangerous due to the narrow twisting roads and frequently speeding cars from the A3.
5. There is already insufficient parking at local stations (which for many residents is much more than a quick walk or cycle away), and the addition of so many new residents will make the situation even worse.
6. I object to para 21 which “limits” development in flood zone 2 and 3. Development should not be permitted in flood zone 2 and 3.
7. I object to para 22 as this does not at all reflect the impact of the buildings on the surrounding area.
8. I object to the inclusion of a 10% buffer in the housing number over the plan period; this proposal is completely unnecessary.

I hope that yourself and the developers will consider these reasons when you decide whether or not to ruin our local area and community with these continued ‘cheap and convenient’ fixes to fulfil quotas when alternatives, such as constructing on the numerous brown field sites within and surrounding London, do exist.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/939</th>
<th>Respondent: 15254337 / Ben Warwick</th>
<th>Agent:</th>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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</table>

I object to the figure of 693 houses per annum in the borough being too high (Appendix D)

GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPS16/6548</th>
<th>Respondent: 15254337 / Ben Warwick</th>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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</table>

I support a new community at Wisley Airfield.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

**I object to the inclusion of the land at Garlicks Arch, Send Marsh/Burnt Common and Ripley (A43)**

Garlick's Arch is Green Belt and has ancient woodland and has a thriving wildlife habitat, which should be protected. There is no infrastructure, it floods and the the Draft Local Plan Infrastructure schedule does not provide for this site at all.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

This is disastrous as the increased volume of traffic would impact the local communities. The increased traffic from London (M25) to Woking would go through Burnt Common, Send and Old Woking, which currently cannot cope with the existing traffic. This is unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the employment strategy and impact on Garlicks Arch (A43) (Policies E2 and E5)
The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13698  Respondent: 15254337 / Ben Warwick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the employment strategy and impact on Garlicks Arch (A43) (Policies E2 and E5)
The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13712  Respondent: 15254337 / Ben Warwick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the employment strategy and impact on Garlicks Arch (A43) (Policies E2 and E5)
The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the lack of proper infrastructure planning for sites (Policy I1)

The current and existing services are over-stretched now, so where are the infrastructure improvements to support the enormous proposed developments, including medical, public transport, schools?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13708  Respondent: 15254337 / Ben Warwick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to poor air quality concerns (Policy 13)

The increased congestion that will arise from the massive proposed developments will in turn lead to increased air pollution which will have damaging effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13714  Respondent: 15254337 / Ben Warwick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the congestion that development will cause to the trunk roads A3/M25 (Policy12)

Both the A3 and M25 need improvements before any developments commence. This is clearly not going to happen in the timescales of the plan, so the proposed developments at Wisley Airfield (A35), Garlicks Arch (A43) and Gosden Hill (A25) should NOT take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13695  Respondent: 15254337 / Ben Warwick  Agent:
<table>
<thead>
<tr>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</th>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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<tr>
<td>I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)</td>
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<tr>
<td>There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td><strong>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</strong></td>
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<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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<tr>
<td><strong>I object to development in areas at risk of flooding (Policy P4)</strong></td>
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<tr>
<td>The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td><strong>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</strong></td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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</table>
The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/13703 **Respondent:** 15254337 / Ben Warwick **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Borough Wide Strategy (Policy S2)

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/940 **Respondent:** 15254369 / Nick Sargent **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This is my response to Guildford Borough Council’s draft plan. I strongly OBJECT to the plan as it currently stands. Specifically, I am deeply concerned by the proposal of site A46 in the Green Belt. The current proposal is grossly inappropriate, unsustainable and arguably not legal. Please see below my points of objection:

No demand for a new school:

- Have the council proved that a new school is required? Several local schools according to Keith Witham a local councillor are undersubscribed and if new places were required would be willing to expand if they became fully subscribed. A school is being built in Mayford which has not yet been completed. Is a further school required?
- It is would be more cost effective to extend existing schools to reduce the risk of an empty school given that surrounding schools are under subscribed and birth rates have dropped in recent years.
• GBC itself previously stated that Blackwell farm would be a better location for a new school if required. Why the sudden change of heart? Could this be because of pressure from Taylor Wimpey.
• I question the legality of a school being an enabler and a trump card for development on the green belt as stated by Cllr Paul Spooner.
• When will the school be built? If the houses are built first then all the children would have to go to other schools, negating the requirement for a school.
• When will the train station be built? If it is built after the school and homes how would children and staff get to school? They will drive adding further traffic and cause chaos on the local roads.
• A recent freedom of information outlined that the government does not know how many kids there will be. How can we propose let alone develop a school without accurate forecasts/predictions.

Too many homes being proposed:

• The proposal of over 1000 homes, retail space and a new school would dramatically change the nature of the village beyond recognition. Normandy and Flexford are semi-rural villages with a few hundred houses. The proposed development would change these villages into urbanised areas.
• The proposal of 1,100 homes seems an odd number to suggest and I have not seen any rationale or justification for this figure. I would strongly recommend investigating the calculation of this number. In addition, I call for a review of the SHMA as it appears to have been disproportionality impacted by Surrey University student needs.
• Why have GBC chosen larger sites instead of smaller sites where 30-50 homes could be developed? This would be easier to sustain and fairer on local communities.

Lack of current infrastructure and any proposals to improve it:

• There is a lack of infrastructure to support such a large scale development with the roads around A46 essentially being country lanes. The new school and homes would add hundreds of cars to roads which are already beyond the capacity they were designed to sustain.
• There is not a robust infrastructure plan to support GBC plan. Nothing in the plan suggests how this additional traffic would be managed. I am concerned about road safety with many of the roads having poor visibility due to blind corners, blind humps, no lighting, invisible entrances and poorly maintained bridges. We already have a speeding problem in the area this development would increase the problem. As a parent of young children this really concerns me.
• The plan mentions nothing about the impact of 1100 homes and 1500 pupils/200 staff on the A323 which is already a road struggling to cope with the traffic capacity and such development would push it beyond its designed capacity.
• The funding included within the proposal for infrastructure improvements is insufficient. This would not cover new bridges and crossing on Westwood and Glaziers Lane which would be required to manage the significant increase in traffic particularly HGVs and buses.
• No consideration has been given to the impact on the already busy Fairlands surgery in the area.

Lack of engagement on proposal and unjustified Green Belt development:

• Why don’t residents get to decide the future of their communities? We have never been consulted on what we would like to have developed in our area. No options have been presented other than 1100 homes. My understanding is that the localisation act and National Planning Policy Framework states that locals should be involved and have local consultations? There has been no meaningful engagement and the engagement recently has been at arm’s length and notification rather than consultation. My understanding is that the application by Taylor Wimpey to develop A46 was made 2 years ago. Plenty of time to have fully engaged local residents.
• The GBC proposal fails the NPFF due to the lack of meaningful engagement and disregard for the Green Belt without providing any exceptional circumstances.
• Why do other improvements to the area have to be included in the plan, can they not be developed anyway? I.e. improvements to the Christmas Pie Trail.

Site A46 is not safeguarded and should be proposed and developed in the same plan:
• Site A46 is **not** currently safeguarded. It was proposed but never approved. Can a site be proposed for safeguarding and developed in the same plan? My understanding is that this is not allowed.

• Site A46 appears to have been a last minute addition to the plan. It appears to have poorly thought through.

• Normandy and Flexford are a key sites to stop urban sprawl and Ash, Tongham, Aldershot and Guildford merging. It represents exactly what the green belt was created to do.

**The funding is questionable:**

• How is the plan being funded? It seems to be overwhelming funded by developers. Is this impartial or legal?

**The plan lacks credibility:**

• The proposal by GBC considers both Normandy and Flexford as one settlement (sustainability) in one section and two in another (sensitivity). This is inconsistent and undermines the validity and credibility of the proposal. This appears to have been done by GBC to get a specific outcome. By separating the two villages the sensitivity is lower as the land in between is disregarded.

**The plan will detrimentally impact the quality of life of many people:**

• The A46 proposal will have a significant detrimental impact on the quality of life of local residents. I am a father of two young girls and I am deeply concerned about the impact this will have on my family. We moved to Flexford for the countryside and community. The plans will cause the countryside to be destroyed including some wonderful wildlife and change the character of the community. During the development which will last years it will cause disruption to our lives, with the increase in pollution, noise and make the roads dangerous with the number of HGVs being required.

**The development would increase pollution:**

• I would be concerned for the health of my family if the proposal was to go ahead due to the increase in traffic pollution both during the development and once completed.

• The proposal would significantly increase in light pollution from the development on the SAONB.

**Endangered wildlife would be destroyed:**

• There are many endangered species in site A46 which would be destroyed by the development including but not limited to:
  • Hedgehogs
  • Owls
  • Sky Larks
  • Stag beetles
  • Adders

**The flood risk would increase:**

• The area is supported by Victorian sewage systems which would be pushed beyond design capacity with any new development of this scale.

• Normandy and Flexford often suffer from flooding. A46 is important in reducing the flood risk as it acts as a natural soak away.

• A46 is within 5km of the Thames Basin Heath Special Protection Area.

• There is a stream located near to site A46 at Manor Fruit Farm. If concreted over this will have severe impact on flooding.

**Listed buildings would be impacted:**

• There are 2x Grade 2 listed buildings very close to the proposed site of the development at A46. These have not been considered within the proposal.
The objections above relate to the overall policy and site A46. To call out some specific GBC policies that the objections relate:

S1, S2, H1, H2, H3, P1, P2, P3, P4, P5, E5, E6, E7, E9, D4, I1, P12, P13 and P14.

The arguments outline above demonstrate that the current plan is not fit for purpose and site A46 should be removed from the proposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/627   Respondent: 15254401 / Kate Gerry   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Ripley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the 2016 Draft Local Plan.
I object to the erosion of the green belt, the removal of villages from the green belt.
I object that you have not provided an adequate consultation process, that you have decided to plan a disproportionate amount of development in one area of the large borough and to include, at the last minute, new sites.
I object to the lack of evidence for this so called housing need.
I object to the ill thought out lack of regard for road infrastructure, services, schools and ancillary services such as shops, doctors surgeries not to mention the increased traffic to an area that is already at maximum capacity and breaking point.
I object that you can make these plans with no regard for the local residents who chose this area, the visitors that come, all of whom enjoy the green belt and all it offers to lifestyles, ways of life, nature and health.

The removal of green belt and over development is a huge life changing, environmental changing decision and one that should not be made with enormous consideration, facts, evidence, local opinion and due debate. I object to you making these decisions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5758   Respondent: 15254433 / Peter Gatford   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am born and bred a Guildfordian, I suspect, unlike many of those proposing the acceptance of this housing explosion in our area. Many come here because it is a lovely town still surrounded by greenbelt countryside, yet having a diversity of employment suitable to most, this but still outside the sprawling London suburbs they have left. Surely to retain that attraction we have to maintain it, not destroy it! We are already seeing the awful effects around us of home extensions and the anything goes policy of planning applications. Destroying the character of many areas. Perhaps we are looking at this from the wrong end. Maybe we should be looking at Local Authority/Government built housing, to satisfy the huge demand by that end of the market! Be it shared housing or rented. Control and asset ownership then is in the hands of the people/council. My experience is that housing markets are dictated by first time buyers. This is a way of controlling that process. Building thousands of houses at the £600,000 to £1 million pound end around Guildford is not the way forward. This just to satisfy the pockets of the developers, the ego of council development officers and the niche end of the market.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/194  Respondent: 15254433 / Peter Gatford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/628  Respondent: 15254465 / Karen Hook  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Here are my reasons:-

1. I OBJECT TO the villages of Ripley, Wisley, Clandon and Send etc being removed from the greenbelt. I OBJECT TO the erosion of the greenbelt in this plan.
2. I OBJECT TO the Garlick's Arch site A43
3. I OBJECT TO site A43a due to increased traffic problems that will potentially be created
4. I OBJECT TO site A45 in order to protect a conservation area.
5. I OBJECT TO site A57 as I believe this to be unlawful.
6. I OBJECT TO the removal of any villages from the greenbelt.
7. I OBJECT TO the excessive quantity of development proposed for this area of the borough.
8. I OBJECT TO last minute addition of new sites at short notice.
9. I OBJECT TO the lack of evidence for housing needs in the proposed areas.
10. I OBJECT TO the lack new schools within the plans to match the level of extra housing.
11. I OBJECT TO the lack of extra Doctors Surgeries within the plans to provide healthcare required for the extra population proposed for the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the inclusion of the site formerly known as Wisley Airfield in the local plan as a possible site for the building of a large number of houses as it flies in the face of ‘localism’.

I especially object to the detrimental impact on transport, local roads and road safety. I specifically object to the proposition that the development will result in a meaningful shift to cycling and walking. The development is miles from anywhere and the residents will be entirely reliant on their cars to get about as there are no transport links of any kind except narrow roads and the enormously busy M25/A3 junction, which could not stand an influx of thousands of extra cars.

Because the Olympic Cycle race and the Prudential Ride London-Surrey cycle race come through Ripley and past Ockham and Horsley, Cyclists are encouraged to cycle throughout this area and the number of cyclists on these narrow roads has increased dramatically especially on Saturday mornings, the favoured shopping time for most people. I object to the addition of any extra cars that will be a massive danger to these cyclists and discourage cycling in direct contravention of the governments aim to encourage it.

Wisley Gardens has proposed an expansion which will increase visitor traffic more than it stands today and so I object to any proposal that will increase the traffic any further and put an already over populated road junction under even greater strain making long stationary queues a probable permanent feature of this junction.

I object to the detrimental effect the development would have on there character of the area. Houses in Ockham are old, vernacular, set back from the road, built in hollows or behind trees, are a maximum of two stories, with perhaps and attic conversion, and very sparsely arranged in terms of number of houses per hectare. This development is scheduled for the crest of a hill, it is urban in nature, has a population density equal to or greater than the most congested parts of London and will have living units up to five stories high; twice the height of anything in the area.

I strongly object to the detrimental effect the proposed development will have on the environment and the various sites of special significance that border it.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
   6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.
10) I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPS16/945</th>
<th>Respondent: 15254689 / Claire Brougham</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

I object to the 2016 Draft Local Plan.

Firstly traffic is already horrendous in the mornings, and afternoons a further 2000 homes would make it impossible to get anywhere.

There are not enough places in local schools for more children.

Loss of green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPS16/947</th>
<th>Respondent: 15254753 / Len Norman</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A21</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
I support this policy retaining this land for Allotment use.

I have had an allotment on this site during the 1980’s and again for the last ten years. It is very near my home and has a truly beneficial effect on my physical and mental health.

After two hip replacements, shoulder surgery, and back pain I am unable to walk far but am quite able to attend my allotment to great effect. I have even entered this year’s allotment of the year which will tell you how successfully I can tend my plot. After retirement the practice of growing became my passion and I spend time every day on the plot at Aldershot Road.

If the building of houses went ahead and/or if the gate at the Aldershot Road end were to shut I would be unable to access the plot and would have to give up the practice which would affect my health undoubtedly.

I feel the fact that the local school children having a plot is most inspiring and do feel it is so important for children to know where food comes from and how it tastes. It seems unfair that housebuilding, business and greed could overshadow the benefits to the whole community here at Westborough.

Please think carefully before putting that greed first.

I understand the need for new housing but think retaining our green and cultivated spaces just as important. By the way I hope everyone concerned is aware of the bees on site at Aldershot Road and of their contribution to the balance of nature.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>1.</th>
<th>I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)</th>
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<tbody>
<tr>
<td></td>
<td>The “objectively assessed need” figure of 693 homes a year is too high.</td>
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<td></td>
<td>A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.</td>
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<td></td>
<td>The current SHMA inflates the proposed housing figure due to</td>
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<td>failure to correct for errors in the historical data for international migration flows,</td>
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<td>issues with the way it considers students and affordability and</td>
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<td>flaws in the method for estimating the number of homes needed to support job growth.</td>
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<tr>
<td></td>
<td>It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.</td>
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</table>

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I OBJECT to Gosden Hill development being in the Local Plan. The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/951  Respondent: 15254785 / M.D. Vickers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)
Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/952</th>
<th>Respondent: 15254785 / M.D. Vickers</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>1. I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)</td>
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The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of 'through' traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/1949</th>
<th>Respondent: 15254785 / M.D. Vickers</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>1. I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)</td>
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I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.
The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<tr>
<th>Comment ID:</th>
<th>PSLPP16/1946</th>
<th>Respondent:</th>
<th>15254785 / M.D. Vickers</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy E1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

1. I OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID:</th>
<th>PSLPP16/1947</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy E2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

1. I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.
There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1948  Respondent: 15254785 / M.D. Vickers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1956  Respondent: 15254785 / M.D. Vickers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment “Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:
To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1953  Respondent: 15254785 / M.D. Vickers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT(POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.
Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1955  Respondent: 15254785 / M.D. Vickers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H3 – Rural Exception Homes

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1950  Respondent: 15254785 / M.D. Vickers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.
Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

1. I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Comment ID: PSLPP16/1952</th>
<th>Respondent: 15254785 / M.D. Vickers</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/1943</th>
<th>Respondent: 15254785 / M.D. Vickers</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1945  Respondent: 15254785 / M.D. Vickers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan.

1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I OBJECT to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

2. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

3. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 3,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2894  Respondent: 15255521 / Wendy Last  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
I OBJECT TO THE PLANS OUTLINES IN POLICY A25 This massive development, coupled with POLICY A43, would transform the rural nature of the villages of Send and Ripley to a sprawling suburb of Guildford. Our Green Belt lost forever!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2896  Respondent: 15255521 / Wendy Last  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO THE PLANS OUTLINED IN POLICY A43 on the grounds that this area is Green Belt and is therefore protected from development. It is a wildlife habitat. What does The Council propose to do about this? The brownfield industrial site at Burnt Common is large enough for the 7,000 sq. m. suggested for further development. If the Council builds on this area, the small, beautiful country villages of Ripley and Send will become suburbs of Guildford in no time at all and their uniqueness and beauty will be lost forever. Please don’t touch our Green Belt! This why we moved to this area, because it is unspoilt! I also object to the plan for 400 new homes, on the grounds that there is insufficient infrastructure to maintain this level of development, viz: health centres, schools etc. I also strongly object to the manner in which this plan was put forward at the last moment, without consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2897  Respondent: 15255521 / Wendy Last  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO THE PLANS OUTLINED IN POLICY A44 on the grounds that this area borders a country lane, one track in places, in a beautiful, rural position. There is a beautiful cemetery adjacent, a place for peaceful reflection and quietude. The ethos of this area will be destroyed by the addition of 2 traveller sites and a further 40 homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Comment ID: PSLPA16/639</th>
<th>Respondent: 15255553 / J.A. Vickers</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
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<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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<tr>
<td>1. I OBJECT to the proposed Infrastructure Schedule (Appendix C)</td>
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<td>The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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<tr>
<td>1. I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)</td>
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<td>° The “objectively assessed need” figure of 693 homes a year is too high.</td>
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<td>° A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.</td>
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<td>° The current SHMA inflates the proposed housing figure due to</td>
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<td>° failure to correct for errors in the historical data for international migration flows,</td>
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<td>° issues with the way it considers students and affordability and</td>
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<td>° flaws in the method for estimating the number of homes needed to support job growth.</td>
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<td>° It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.</td>
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<td>The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe</td>
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inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPS16/956  **Respondent:** 15255553 / J.A. Vickers  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

1. I OBJECT to Gosden Hill development being in the Local Plan. The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.
There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size. Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/957  Respondent: 15255553 / J.A. Vickers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community
Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy P4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1971  Respondent: 15255553 / J.A. Vickers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1968  Respondent: 15255553 / J.A. Vickers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1969  Respondent: 15255553 / J.A. Vickers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.  I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1970  Respondent: 15255553 / J.A. Vickers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.  I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1976  Respondent: 15255553 / J.A. Vickers  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H3 – Rural Exception Homes

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.
The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1972   Respondent: 15255553 / J.A. Vickers   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy II)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

1. I OBJECT to the lack of proper infrastructure planning for sites (Policy II)

Policy II requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Respondent: 15255553 / J.A. Vickers</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/1974</th>
<th>Respondent: 15255553 / J.A. Vickers</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
1. I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1. I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/1964  Respondent:  15255553 / J.A. Vickers  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan.

1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including...
Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1965  Respondent: 15255553 / J.A. Vickers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the Borough Wide Strategy (Policy S2)

   1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

   2. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

   3. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guilford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.
It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID:</th>
<th>PSLPA16/4308</th>
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<td>Document:</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Sustainability Appraisal

1.29 It is apparent that the proposed allocation at ‘Land to the south of Normandy and north of Flexford’ (Policy A46) which is a residential led mixed use development site for approximately 1,100 homes cannot be considered to be “small scale”.

1.30 Whilst the SA states that the preferred approach “performs well” (including ‘Land to the south of Normandy and north of Flexford’ (Policy A46)) in terms of potential housing provision across the plan period because “there is a reliance on smaller sites at villages partly because these sites are ‘deliverable’” a review of the housing trajectory in the LAA does not demonstrate this.

1.31 Our client’s site could deliver around 70 houses within the first five years of the plan period to contribute to meeting the extensive needs which exist within this area as well as within the Borough as a whole to contribute to ensuring the soundness of the plan.

1.32 With regards to the site options appraisal findings set out in Table C of Appendix IV of the SA it is noted that the spreadsheet which supports this Table was not made available until 11/07/2016 following a request made to the Council. This information was not therefore available for the full six week consultation period.

1.33 Nonetheless from an initial review of Table C it is apparent that based on the ranking exercise undertaken by the Council in the SA that the site allocated in the Local Plan under Policy A43 (Land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley) does in fact have the poorest performance of all of the sites assessed in relation to Send.

1.34 Furthermore if the performance of this allocated site is also compared to the sites considered in respect of Send Marsh as well it remains the poorest performing site with a total of ten indicators being scored as red which equates to 48% of the overall criteria.
1.35 The spreadsheet which accompanies Table C on which the ranking exercise for the SA has been based is also inaccurate in many places in relation to our client’s site. Key areas of concern are set out below:

1.36 Flood risk - ‘Land north of Send Marsh’ is stated as being in Flood Zone 3 and therefore given a red ranking against flood risk in the site options appraisal. The Council was originally presented with evidence in September 2014 to demonstrate that the site is not at risk of flooding and this ranking is therefore incorrect. The entire development can be delivered without encroaching into any areas liable to flooding, and this site should rightly score a green ranking against flooding and not a red ranking.

1.37 Previously developed land - In addition we have also submitted a ‘Previously Developed Status of Land’ report in February 2016 which concludes that there “is no evidence of the site ever being agricultural use in recent times” and provides significant evidence “to support the case for the site being Previously Developed Land.” This category should also score a green ranking and not a red ranking.

1.38 In order to minimise any potential for legal challenge to the Local Plan process, it is recommended that the SA is updated to take the above points into consideration and ensure the soundness of the plan.

1.39 With the correct scoring, it is apparent that ‘Land north of Send Marsh’ performs strongly when assessed against the 21 categories the Council have opted to appraise all reasonable site options against.

1.40 In order to minimise any potential for legal challenge to the Local Plan process, it is recommended that the SA is updated to take the above points into consideration and demonstrate how all reasonable alternatives have been considered in order to ensure the soundness of the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
2.5 Odyssey Markides have prepared a Highways Statement which is appended to this statement at Appendix Two, which demonstrates that a residential development of up to 70 dwellings would be deliverable and acceptable in respect of transport issues.

2.6 This report firstly addresses the National policy context, followed by a summary of the background position and then provides a response to the overall strategy, approach to the Green Belt, previously developed land and settlement boundary of villages. It then provides a response to the proposed allocated sites, considers the sustainability appraisal and detailed policy matters and finally draws the representation to a summary and conclusion.

2.7 This report is submitted for consideration in the preparation of the Guildford Borough Proposed Submission Local Plan: Strategy and Sites, June 2016.

2.8 Guildford appears to have embraced national Government Advice, made clear within the Housing and Planning Act, to ensure that Local Plans are put into place as quickly as possible in order to facilitate much needed strategically planned growth. In this regard, Guildford’s commitment to progressing their Local Plan in line with Government Advice and the Housing and Planning Act is supported.

2.9 This commitment to progressing their Local Plan is demonstrated by the fact that Guildford has now progressed to a Regulation 19 consultation, which is also welcomed.

2.10 The proposed settlement hierarchy for the Borough’s settlements is also supported as set out in the ‘Guildford Borough Settlement hierarchy’ which forms part of the evidence base for the Proposed Submission Local Plan: Strategy and Sites June 2016.

2.11 As set out in section 4.0 of the document entitled, ‘Guildford Borough Settlement Hierarchy’, (which refers to the ‘updated settlement hierarchy’), the sustainability ranking of the settlements designates Send Marsh/Burntcommon as a large village. Large villages are defined in the settlement hierarchy as being “unsuitable for substantial growth but capable of accommodating a proportionate extension.”

2.12 The conclusions state that “it would be appropriate to direct new development towards…Send Marsh/Burntcommon” and other locations within the Borough which are considered to be “the most sustainable in terms of their level of community services and facilities, access to higher order centres and employment opportunities, and ability to support new development.”

2.13 This approach and the conclusions in relation to Send Marsh within the ‘Guildford Borough Settlement hierarchy’ are supported.

3.1 This section provides a brief review of the approach which local planning authorities are required to take in preparing Local Plans for their areas, with particular reference to planning for their identified housing requirements.

National Planning Policy Framework

3.2 Published in March 2012, the National Planning Policy Framework (NPPF) provides the overarching Government policy document in relation to planning.

3.3 The NPPF requires Local Plans to be “prepared with the objective of contributing to the achievement of sustainable development” (paragraph 151). As such paragraph 154 states that Local Plans “should address the spatial implications of economic, social and environmental change”. They should set out “the opportunities for development and clear policies on what will or will not be permitted and where”.

3.4 Local Plans should be drawn up over an appropriate timescale. Preferably this will involve a 15-year time horizon but also taking into account longer term requirements.

3.5 The NPPF establishes the ‘presumption in favour of sustainable development’ in paragraph 14, which in particular for plan-making means that:

“Local planning authorities should positively seek opportunities to meet the development needs of their area.”
Housing Provision

3.6 One of the key objectives of the NPPF, set out in para. 47, is to “boost significantly the supply of housing”. In order to achieve this aim, the Local Planning Authority should:

"Use their evidence-base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the framework, including identifying key sites which are critical to the delivery of the housing strategy over the Plan period."

Delivering a wide choice of high quality homes

3.7 The Government’s ambition is to boost significantly the supply of housing. Paragraph 47 of the NPPF requires local planning authorities to identify and update annually a supply of specific deliverable sites sufficient to provide five years’ worth of housing against their housing requirements, with an additional 5% to 20% buffer depending on past performance of delivery. Local planning authorities need to provide a realistic prospect of achieving planned supply and to identify a supply of specific, developable sites or broad locations for growth for years 6-10 and where possible for years 11-15.

3.8 In addition paragraph 17 states that every effort should be made objectively to identify and then meet the housing needs of the area. Local Planning Authorities are required to ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.

3.9 Paragraph 50 of the NPPF deals with the need to deliver a wide choice of high quality housing, widen opportunities for home ownership and create sustainable, inclusive and mixed communities. It sets out three specific points. The first is to plan for a mix of housing based on current and future demographic trends and needs of different groups. The second point is for a Local Authority to identify size, type and tenure as well as the range of housing required in particular locations reflecting local demand. The last point is where affordable housing is required, to set policies for meeting that need on site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPA16/4310 | Respondent: | 15256225 / Boyer (Michelle Thomson) | Agent: |
|-------------|---------------|-------------|-------------------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ) , is Sound? ( ) , is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

National Position

4.1 Housing and Planning Act and streamlining the planning process

4.2 The objective of the Act is to assist the Government in improving UK housing provision by setting out a number of reforms to assist in the delivery of new homes and to address current issues which are delaying the process.

4.3 The Housing and Planning Bill received Royal Assent on 12 May 2016. Sections 143 to 146 bring in new powers for the secretary of state to intervene in plan-making, reflecting the government’s commitment for all planning authorities to produce a local plan by early 2017.
4.4 On 18th February 2016 the Government published a ‘Technical Consultation on Implementation of Planning Changes’. (The consultation ran until 15 April 2016). The consultation document confirms the intention of the Government to take action to get plans in place and ensure plans have up-to-date policies by:

- Publishing league tables, setting out local authorities’ progress on their local plans;
- Intervening where no local plan has been produced by early 2017, to arrange for the plan to be written, in consultation with local people, to accelerate production of a local plan; and
- Establish a new delivery test on local authorities, to ensure delivery against the number of homes set out in local plans.

Local Position

4.5 The West Surrey Strategic Housing Market Assessment covering Guildford, Waverley and Woking Borough Council’s Final Report dated September 2014 was released into the public domain on Friday 2nd October 2015.

4.6 Paragraph 10.37 of this document set out that, ‘Taking these factors into account the SHMA draws the following conclusions on the overall need for housing over the 2013-33 period: Guildford: 693 homes pa.’

4.7 Prior to this publication, there were various estimates of housing need for Guildford Borough.

4.8 Paragraph 8.24 of the Guildford and West Surrey Strategic Housing Market Assessment Final Draft Report published in May 2014 sets out that, ‘On the balance of the evidence, we would recommend that the Council tests the ability to deliver up to 780 homes per annum within the borough over the plan period to 2031… The additional uplift from 652 to 780 homes per annum would be sufficient to support improvements in affordability; and to make a tangible difference to meeting affordable housing needs…’

4.9 The West Surrey Strategic Housing Market Assessment Summary Report published in December 2014 then set out at paragraph 2.24 that, ‘the SHMA draws the following draft conclusions on the overall needs for housing: Guildford – 620 – 816 homes pa.

4.10 The current need of 693 therefore appears to be a low ‘mid-range point’ of the need referred to in previous iterations of the SHMA.

Local Plan Review

4.11 Guildford Borough consulted on the Draft Local Plan from July to September 2014. This was a consultation under Regulation 18 of the Town and Country Planning ((England) Regulations 2012.)

4.12 In the foreword statement to the Draft Local Plan June 2014 by Councillor Stephen Mansbridge, (the then Leader of the Council), it was suggested that, ‘To ignore or dismiss the borough’s need for more housing and employment land would be a destructive and dangerous strategy that would do great harm to the place that we all cherish. In total this plan will take up 2 per cent of green belt land… The Plan has to take into account our persistent under delivery of housing in past years and the almost complete absence of a 1-5 years land supply.’

4.13 Policy 2: Borough Wide Strategy of the June 2014 Plan set out that, ‘During the plan period (2011-31), we will make provision for 13,040 new homes, which equates to an annual requirement of 652 new homes a year… In order to provide a level of flexibility and to ensure that the realigned green belt boundaries endure beyond the plan period, we are safeguarding approximately 99 hectares of land. ’ As highlighted in the supporting text to the policy, it is recognised that this annual requirement represents a significant increase over the previous Local Plan requirement.

4.14 At that time, the Council’s proposed housing target had been informed by the draft Strategic Housing Market Assessment (SHMA) (January 2014). Notably the SHMA recommended that the Council tested the ability to deliver up to 780 new homes per annum over the period to 2031.

4.15 It is also notable that the Council’s selected housing target at that time was at the bottom level of the scenarios assessed in the SHMA. Para 8.24 of the SHMA set out that, ‘The additional uplift from 652 to 780 homes per annum would be sufficient to support improvements in affordability; and to make a tangible difference to meeting affordable housing needs (although not fully meeting it, this would require a further uplift) as well as meeting the baseline demographic growth in the Borough.’
4.16 Against this backdrop to the housing numbers and policy, ‘Land at Polesden Lane and Send Marsh Road, Send Marsh’ (the site the subject of this representation) was identified in the draft Guildford Borough Local Plan as Site 120, which was proposed to be safeguarded for development beyond the plan period.

Green Belt Review

4.17 A Guildford Borough Green Belt and Countryside Study (GBCS) was published in February 2013. This Green Belt and Countryside Study included the site, the subject of this report as area B16-A. The GBCS identifies this site as suitable for residential development if sufficient deliverable land outside of the green belt is not identified. The GBCS concluded the following in relation to the site:

‘B16-A is surrounded by defensible boundaries with partial visual enclosure including tree cover following ditch and residential gardens at Danesfield to the north and east; residential gardens following Polesden Lane and Send Marsh Road to the south; and tree belts with open farmland to the west, B16-A is relatively unconstrained in environmental capacity terms, however, it is partly located within a designed flood risk area to the north west. B16-A scored 6 and was ranked 22nd according to current sustainability credentials. The estimated residential development capacity of B16-A is 47 dwellings.’

Local Development Scheme

4.18 On 29th September 2015, a formal timetable (Local Development Scheme) for the production of a Local Plan, Development Management Policies and production of the Community Infrastructure Levy (CIL) was considered at an Executive meeting of the Council. The LDS was supported by an Executive Report.

4.19 Of particular note was the discussion of a Regulation 18/Regulation 19 consultation stage in taking the Local Plan forward.

4.20 Statutory instrument 2012 No. 767 sets out The Town and Country Planning (Local Planning) (England) Regulations 2012. This includes Regulation 18 and Regulation 19. Regulation 18 refers to the bodies and persons to be notified at the stage of preparation of the local plan about the subject of a local plan and inviting representations to the local planning authority about what a local plan ought to contain. Regulation 19 refers to the publication of a local plan and what should happen prior to submitting a local plan to the Secretary of State.

4.21 It is therefore clear that the Regulation 18 requirements must be met and complied with prior to proceeding to the Regulation 19 requirements.

4.22 A Regulation 18 consultation is recognised as providing the earlier opportunity to engage in the plan making process with greater flexibility to influence the Local Plan (including policies, housing numbers and allocations). The Regulation 19 consultation is the Publication Stage where the Council is setting out their intended direction with more certainty and therefore considered by many to offer reduced scope for variation.

4.23 There have previously been two Regulation 18 consultations; the Issues and Options consultation in October to November 2013 and the draft Local Plan consultation in July to September 2014.

4.24 Paragraph 5.5 of the Executive Report for the Guildford Borough Local Plan: Local Development Scheme set out that, ‘A legal opinion has been sought on this matter to ensure that the approach taken meets the requirements set by the regulations and can be robustly defended at examination. The advice received is that it would be advisable to proceed straight to Regulation 19 stage for a number of reasons:

- It would make progress towards the goal of achieving a plan.
- The risks can be ameliorated by, if necessary, repeating the Regulation 19 consultation.
- There is a strong argument that the two rounds of consultation already comply with the requirements of Regulation 18.’

4.25 Given the pressing need to prepare a sound new Local Plan as quickly as possible and in light of the legal advice received, Guildford Borough Council has progressed straight to a Regulation 19 consultation.
Background to Previously Developed Land

7.1 The Glossary at Annex 2 of the NPPF sets out the definition of previously developed land as follows: ‘Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.’

Approach at Guildford

7.2 Paragraph 4.29 of the Topic paper: Green Belt and the Countryside June 2016 sets out that, ‘Whilst not villages, a similar approach is applicable to major previously developed sites in relation to whether they should remain washed over or be inset from the Green Belt. National policy requires that land which it is unnecessary to keep permanently open should not be included in the Green Belt. If major previously developed sites are of sufficient scale and do not possess an open character, it is not considered necessary for them to remain within the Green Belt. We consider that this constitutes the exceptional circumstances required to amend the Green Belt boundary to inset these sites.’

7.3 Paragraph 5.6 and 5.7 of the Green Belt and the Countryside Topic Paper list the sites considered to be previously developed and inset from the Green Belt, setting out that, ‘The following major previously developed sites are proposed to be inset from the Green Belt: Henley Business Park, HM Prison Send, Keogh Barracks, Mount Browne, Pirbright Barracks, Pirbright Institute and the University of Law Guildford.’

7.4 ‘The following traveller sites are proposed to be inset from the Green Belt: Land at Cobbets Close, Normandy; Land at The Paddocks, Rose Lane, Ripley; Four Acres Stable, Normandy; Land rear of Roundabout, Wood Street Village; The Orchard, Puttenham; Valley Park Equestrian Centre, Shalford; Land rear of Palm House Nurseries, Normandy; Whittles Drive, Normandy.’

7.5 The broad approach to removing major previously developed sites from the Green Belt accords with national planning policy and is supported. However, the evidence base to support Guildford’s assumptions about the sites considered to be previously developed appears to be somewhat lacking. There are no details as to the methodology or reasoned justification that has been applied to demonstrate that a site should be considered as previously developed land.
7.6 The DCLG, ‘Technical consultation on implementation of planning changes’ covers ‘identifying brownfield land that is suitable for housing.’ Whilst at consultation stage and not implemented, this document provides the an indication of the direction of travel.

7.7 Paragraph 3.13 sets out that, ‘Brownfield or previously developed land is defined in Annex 2 of the National Planning Policy Framework. Sites on brownfield registers will be required to meet this definition of previously developed land. This is a very broad definition and, apart from the exclusions, covers all land in England where there are or have been buildings or other development. Much of this land is already in productive use and would not be suitable for new housing.’

7.8 Paragraph 3.16 then sets out that, ‘Authorities should adopt a positive, proactive approach and consider both large and small sites. They should only reject potential sites if they can demonstrate that there is no realistic prospect of sites being suitable for new housing.’

7.9 Paragraph 3.17 of this consultation document is also relevant, which sets out that, ‘To be regarded as suitable for housing our proposed criteria are that sites must be:

• Available…
• Capable of supporting five or more dwellings or more than 0.25 hectares…
• Capable of development. Local authorities should ensure that sites are suitable for residential use and free from constraints that cannot be mitigated…’

7.10 Paragraph 3.23 then addresses publicity and consultation requirements and sets out that, ‘A key purpose of brownfield registers is to provide transparent information about suitable sites to local communities, developers and others. We propose that information about potentially suitable sites should be available at local authority offices and online. Once local authorities have considered representations on their proposed list of sites, we will encourage them to publicise their decisions, including reasons why sites have or have not been granted permission in principle.’

7.11 It is clear that Guildford’s published evidence base does not address the majority of these points. Indeed, assumptions appear to have been made about whether land is previously developed and these assumptions have not been made public. It appears that these assumptions result in different conclusions about what is considered to be PDL than the definition as set out in the NPPF and proposed to be used by DCLG in the Technical Consultation.

7.12 In the absence of any evidence base being produced by Guildford Borough Council, specific and detailed evidence demonstrating the case for concluding that the site at Send Marsh should be considered to be previously developed land (PDL) was submitted to Guildford Borough Council in February 2016. This report is entitled, ‘Land at Polesden Lane and Send Marsh Road, Send Marsh, Previously Developed Status of Land’ and is attached again at Appendix Four to this representation.

7.13 The February 2016 report at Appendix Four concluded with the words that it had been prepared ‘specifically to correct the description of the site as pasture land’ and additionally as set out at paragraph 1.5 of the report in response to the fact that, ‘The Local Planning Authority now has a requirement to produce and maintain a register of previously developed land within its administrative area.’

7.14 In addition to the evidence of previous development set out in that report, it highlighted that, ‘There is no evidence of the site ever being in agricultural use in recent times. It is in the hands of a house builder and therefore it can be delivered without delay.

‘The site can be developed using land only in Flood Zone 1, i.e. avoiding any land within Flood Zone 2 or 3. Significant evidence has been provided to support the case for the site being Previously Developed Land. The site has been occupied by permanent non-agricultural structures for much of the Twentieth Century. The remains of these structures are still visible on site and the findings of the Geo-Technical assessment lends further support to the existence of foundations to the extent that these have not fully blended into the landscape.’

‘It is considered that because of the history of previous uses of the site that it is to be regarded as Previously Developed Land, which increases its suitability for residential development. Other than the existing Green Belt designation, there are no other overriding constraints to the site which would prevent its early release for development.’
7.15 The above also demonstrates that the approach adopted by Guildford conflicts with DCLG’s proposed approach that, ‘They should only reject potential sites if they can demonstrate that there is no realistic prospect of sites being suitable for new housing.’

7.16 The Guildford Borough Land Availability Assessment (LAA) dated February 2016 considers the site at page 543 within the table entitled ‘Discounted sites – housing’. This document gives the site ID reference 1221, ‘Land at Polesden Lane and Send Marsh Road, Send’. The supporting text sets out, ‘Our spatial strategy and site allocations have been considered through the Sustainability Appraisal and this site no longer accords with the proposed spatial strategy in the Local Plan. The site was identified in the Green Belt and Countryside Study but is located within high sensitivity Green Belt.’ Guildford has produced one table entitled ‘Previously Developed Land in the green Belt, Discounted sites (housing)’ and a second table entitled ‘Green Belt, Discounted sites (housing). As the site is listed under the latter table, it is clear that the Council has concluded that the site is not considered to be previously developed land.

7.17 Although there is a statement at the end of the document setting out that, ‘…if there is information about additional previously developed land in Guildford borough that would help us to update this LAA, we would be grateful to receive it’, it does not appear that information previously sent to the Council has informed that evidence base and latest documents.

7.18 The case to support the removal of the site from the Green Belt has been clearly established above. This identifies the weaknesses within the methodology adopted by the Council and particularly our Green Belt Assessment originally submitted to the Council in February 2016, see Appendix Three which has informed their Green Belt Assessment.

7.19 Our Green Belt Assessment at Appendix Three has clearly demonstrated that our site, ‘at best, makes only a very limited contribution to the purposes of including land within the Green Belt.’ In accordance with the direction referred to at paragraph 6.8 above, by revising the evidence base to justify the release of land within the Green Belt, and adopting the approach as advised, which accords with both PAS guidance and best practice, it is clear, as robustly demonstrated by our Green Belt Assessment that the site at Send Marsh should be removed from Green Belt.

7.20 It has therefore been clearly demonstrated that 1) the site should be removed from the Green Belt and 2) the evidence presented demonstrates that the site should be considered previously developed land in accordance with the definition within the NPPF and subsequently proposed to be taken forward to inform the brownfield register.

7.21 Following Ministerial Guidelines it is therefore of fundamental importance that the Council demonstrates that the proposed approach with regards to both Green Belt and subsequently previously developed land in the Green Belt is supported by a robust evidence base in order to demonstrate it has appropriately considered all reasonable alternatives to ensure the plan and policies P2: ‘Green Belt’ and D4: ‘Development in urban areas and inset villages’ are sound.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPA16/4312</th>
<th>Respondent:</th>
<th>15256225 / Boyer (Michelle Thomson)</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
<td></td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Overview of the Sustainability Appraisal

10.1 The Sustainability Appraisal (SA) of the Guildford Borough Local Plan (June 2016) forms part of the evidence base for the emerging Local Plan and is described as a “mechanism for considering and communicating the likely effects of a draft plan, and alternatives, with a view to avoiding and mitigating adverse effects and maximising the positives.”

10.2 In paragraph 5.1.5 the SA sets out that although there are a wide range of issues covered by the emerging Local Plan “the key issue/objective relates to the allocation of land to meet housing needs.” The SA therefore focuses on this issue and sets out to provide an appraisal of the alternative spatial strategies and reasonable alternatives available.

Housing Growth in Villages

10.3 In keeping with the ‘Guildford borough Settlement hierarchy’ the SA identifies that although in line with the sequential approach, growth at Green Belt sites around the villages is the final location at which to deliver growth, nonetheless “significant growth around villages is necessary” and nil growth in these locations “is not a reasonable option as several sites do have merit”.

10.4 Whilst the hierarchical approach to the allocation of growth across the Borough is broadly supported it is clear that the terminology currently utilised to describe a number of sites in the SA would benefit from revision. In particular in terms of the SA it is apparent that the five sites listed as ‘givens’ in terms of Green Belt sites around the villages cannot be described as “broadly supported” or “relatively small scale”.

10.5 In particular ‘Land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley’ (Policy A43) was not previously included in the Regulation 18 consultation and indeed was added to the draft plan at the point it was considered at the Extraordinary Council meeting for the emerging Local Plan.

10.6 It is therefore unclear how the SA can describe this site as being a ‘given’ owing to the fact it is “broadly supported” when this matter remains untested and will only be demonstrated through the Regulation 19 consultation process to which this report responds.

10.7 In addition it is also apparent that the proposed allocation at ‘Land to the south of Normandy and north of Flexford’ (Policy A46) which is a residential led mixed use development site for approximately 1,100 homes cannot be considered to be “small scale”.

10.8 ‘Land to the south of Normandy and north of Flexford’ (Policy A46) is an allocated site covering 67 ha which is described in Policy A46 as being the “creation of a sustainable and inclusive community that can meet its day to day needs within the community.” It is therefore apparent that this represents a significant strategic site which is to deliver approximately 8% of the Council’s OAN.

10.9 Given the size of this site and the need to ensure the soundness of the plan additional evidence supporting the assumptions set out in the SA that this site “will be deliverable in the early part of the plan period” should be produced. This should address the fact that the SA conflicts with the information presented in the Housing Trajectory. The SA should also be updated to reflect that this is not a “small scale” development.

Housing Delivery

10.10 The ‘Sustainability Appraisal (SA) of the Guildford Borough Local Plan’ “identifies, describes and evaluates’ the likely significant effects of implementing ‘the plan, and reasonable alternatives’”. In total the SA appraises a total of 8 separate spatial strategies which deliver varying levels of housing growth across the Borough including Option 1 which delivers the OAN with no buffer through to Option 8 which delivers the OAN plus a 34% buffer.

10.11 The Council’s preferred approach is Option 4 which represents the delivery of the OAN plus a 14% buffer. The Council notes that the incorporation of this buffer will ensure that Guildford’s OAN is met in practice and ensures that some resilience is built into the Local Plan.

10.12 This corresponds to the Housing Trajectory set out in the Land Availability Assessment (LAA) which demonstrates that the potential housing provision across the plan period is 15,844 homes.
10.13 Whilst the SA states that the preferred approach “performs well” in this regard because “there is a reliance on smaller sites at villages partly because these sites are ‘deliverable’” a review of the housing trajectory in the LAA does not demonstrate this.

10.14 The Housing Trajectory also illustrates that ‘Land to the south of Normandy and north of Flexford’ is not anticipated to deliver any housing before 2021/22.

10.15 Furthermore contrary to the assumptions set out in the SA the Housing Trajectory indicates that in the first five years of the plan period ‘Land to the south of Normandy and north of Flexford’ is only predicted to provide a total of 200 dwellings towards the potential housing provision figure within the Borough. The majority of the housing will be delivered in the later stages of the plan period with approximately 82% of the housing being delivered between 2023 to 2029 based on the trajectory provided in the LAA.

10.16 This therefore re-emphasises that this strategic site will not be able to deliver in the early part of the plan period, contradicting the position as currently set out in the SA.

10.17 Consideration should also be given to the significant infrastructure which is required in respect of ‘Land to the south of Normandy and north of Flexford’ (Policy A46) including a secondary school (up to eight form entry), a significant bus network, an off site cycle network and a bespoke SANG, resulting in likely delays to the delivery of this site. Furthermore Policy A46 also sets out a requirement for any development to address the potential highway performance issues which could otherwise result from the development.

10.18 Given the above requirements and the evidence set out in the LAA it is apparent that this site will not be deliverable in the early part of the plan period.

10.19 This again highlights the point made earlier in this representation in that, in order to ensure the soundness of the plan, there is a need to fill a gap in the early years in the plan period with sites where there is certainty that they can and will be delivered. This will ensure diversity of supply and ensure the plan accords with the requirements of paragraph 47 of the NPPF.

10.20 Our client’s site could deliver around 70 houses within the five years of the plan period to contribute to meeting the extensive needs which exist within this area as well as within the Borough as a whole.

Recommendations

10.21 The SA does to some extent acknowledge this “pressure to allocate sites that are able to deliver in the early plan period” and therefore considers the possibility of allocating additional village sites.

10.22 The SA identifies three sites at Send which “come into contention” owing to the fact that they are outside of the AONB and comprise of amber-rated Green Belt.

10.23 Given the ‘red rating’ of the land parcel in the Green Belt Sensitivity Assessment, Land at Polesden Lane and Send Marsh Road, Send Marsh is not included within the three sites that ‘come into contention’ in Send.

10.24 It is therefore clear that for such heavy reliance in the SA to be placed on the Green Belt Sensitivity Assessment re-emphasises the strong concerns raised above with regards to the Council’s Green Belt Assessment methodology. It results in an incomplete assessment of the reasonable alternatives.

10.25 As such in order for the emerging Local Plan to be found at sound at examination it is considered essential that the SA be updated following a revised Green Belt Assessment to feed into an updated Sensitivity Assessment, as set out above in Section 5 of this representation.

Sustainability Appraisal – Site Options Appraisal

10.26 With regards to the site options appraisal findings set out in Table C of Appendix IV of the SA it is noted that the spreadsheet which supports this Table was not made available until 11/07/2016 following a request made to the Council. This information was not therefore available for the full six week consultation period.
10.27 Given that this information is stated to allow for a much “more effective interrogation of the data” set out in the SA it forms an important part of the evidence base for the Local Plan.

10.28 As such we therefore reserve the right to submit further information in regards to the site options appraisal findings on the basis that the information was not publically available alongside all other consultation documents for the full six week consultation period.

10.29 Nonetheless from an initial review of Table C it is apparent that based on the ranking exercise undertaken by the Council in the SA that the site allocated in the Local Plan under Policy A43 (Land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley) does in fact have the poorest performance of all of the sites assessed in relation to Send Marsh.

10.30 Furthermore if the performance of this allocated site is also compared to the sites considered in respect of Send Marsh as well it remains the poorest performing site with a total of ten indicators being scored as red which equates to 48% of the overall criteria.

10.31 The SA should therefore be revised to provide additional evidence to support the inclusion of this allocated site within the Local Plan and also to re-consider its status as a ‘given’. These revisions are considered necessary in order to ensure that the emerging Local Plan is found sound at examination.

**Land at Polesden Lane, Send Marsh (Our client’s site)**

10.32 Having received the spreadsheet which accompanies Table C it is also noted that the information on which the ranking exercise for the SA has been based is also inaccurate in many places in relation to our client’s site. Key areas of concern are set out below:

**Flood risk**

10.33 ‘Land north of Send Marsh’ is stated as being in Flood Zone 3 and the SA analysis is therefore inaccurate. As a result of this error the site is given a red ranking against flood risk in the site options appraisal. The Council has previously been presented with evidence to demonstrate that the site is not at risk of flooding and this ranking is therefore incorrect.

10.34 As long ago as September 2014 we submitted to the Council a report in response to the Draft Guildford Borough Local Plan: Strategy and Sites consultation, which demonstrated that Flood Zones 2 and 3 only affected the north western segment of the site and contained a plan indicating the greater part of the site which was not so affected. This report with all of the relevant information about flooding, is attached again at Appendix Five and demonstrates that the entire development can be delivered without encroaching into any areas liable to flooding.

10.35 On the basis that the entire development can be delivered without encroaching into any areas liable to flooding, this site should rightly score a green ranking against flooding and not a red ranking.

**Previously developed land**

10.36 In addition we have also submitted a ‘Previously Developed Status of Land’ report in February 2016 which concludes that there “is no evidence of the site ever being agricultural use in recent times” and provides significant evidence “to support the case for the site being Previously Developed Land.”

10.37 Based on the classifications set out in Table C and the accompanying spreadsheet it would appear that the Council has failed to take these representations and previously submitted information into account and no assessment of this evidence appears to have taken place.

10.38 On the basis that evidence has been presented to the Council demonstrating the previously developed nature of the site, this category should also score a green ranking and not a red ranking.

**Site Comparison**

10.39 In order to directly compare sites, the SA scoring must be compared by assigning a quantitative basis for the colour coding. If the same approach utilised by the Council to compare Options 1 – 8 in Table 7.1 of the SA is adopted then a
green ranking is assigned a score of one, an amber ranking is assigned a score of two and a red ranking is assigned a score of three.

10.40 Sites with the greatest number of red rankings across the 21 categories each site is assessed against will therefore have the highest total score whilst sites with the greatest number of green rankings will have the lowest total score.

10.41 On the basis of the incorrect red ranking attributed to flood risk and previously developed land in the site options appraisal then the total score for ‘Land north of Send Marsh’ is 41. However once these errors are corrected and the flood risk and previously developed land categories are correctly assigned a green ranking and assigned a score of 1 then the total score for ‘Land north of Send Marsh’ is significantly reduced to 37.

10.42 If the scoring method outlined above is also applied to all sites within the SA, then ‘Land north of Send Marsh’ (i.e. our client’s site) ranks joint second out of all of the sites assessed in Send Marsh for housing use with a total of 11 green rankings.

10.43 It is therefore apparent that ‘Land north of Send Marsh’ performs strongly when assessed against the 21 categories the Council have opted to appraise all reasonable site options against.

10.44 In order to minimise any potential for legal challenge to the Local Plan process, it is recommended that the SA is updated to take the above points into consideration and demonstrate how all reasonable alternatives have been considered in order to ensure the soundness of the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4313  Respondent: 15256225 / Boyer (Michelle Thomson)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

12.1 These representations have been prepared in response to the Guildford Borough Proposed Submission Local Plan: Strategy and Sites June 2016. This report has taken into account earlier representations, as relevant, made to the Council in response to consultation on the emerging Local Plan and its supporting evidence base.

12.2 Our client supports the aspirations of the Local Plan in terms of Guildford’s commitment to progress their Local Plan demonstrated through progressing to a Regulation 19 consultation

- Guildford’s commitment to meet their full objectively assessed housing need
- The acknowledgement that Green Belt releases are required to achieve this
- The approach to the settlement hierarchy
- The conclusion that Send Marsh is a ‘large village’ which is considered to be a sustainable location and appropriate to direct new development which represents a ‘proportionate extension’
12.3 It is however apparent that there are a number of outstanding issues which need to be addressed in order for the Plan to be found sound at examination. These points are highlighted below.

Delivery of sites

12.4 In particular these representations have identified that the Local Plan relies heavily on strategic sites to deliver the required housing during the plan period which makes the plan vulnerable. This is particularly the case given that six sites are being relied upon to deliver 66% of the overall OAN requirement in the late stages of the plan period.

12.5 The Plan should demonstrate a 5 year housing land supply at the point of adoption. Guildford Council’s proposed position will be that they will not be able to do so and consequently the plan is unlikely to be found sound on this basis without modification.

12.6 In order to ensure that the Local Plan is found sound at Examination we would therefore strongly recommend that the Council revises its housing trajectory to incorporate a greater number of smaller sites which can deliver in the earlier stages of the plan period thereby ensuring that the housing trajectory is robust and achievable.

12.7 Our client’s site could deliver both market and affordable housing within the first five years of the plan period to contribute to meeting the extensive needs which exist within this area as well as within the Borough as a whole at the start of the plan period.

Approach regarding Green Belt releases

12.8 The Green Belt releases to enable the Council to achieve their OAN are based on a Green Belt and Countryside Study. The Green Belt and Countryside Study prepared by the Council has significant limitations. These in summary relate to 1) The usage of a binary system to assess a site’s contribution to Green Belt purposes (with parcels scoring either a 1 or 0) without providing any quantification on the degree of that contribution and 2) as a result of the first limitation there is not the ability for any detailed form of ranking.

12.9 Boyer has therefore carried out an independent assessment of PDAs and MPDAs around Send/ Send Marsh. This assessment concludes that the site, at best, makes only a very limited contribution to the purposes of including land within the Green Belt.

12.10 In addition it has been demonstrated that the current Green Belt inset boundary as proposed fails to adhere to the NPPF in that it does not follow physical features that are readily recognisable and likely to be permanent (Paragraph 85). This appears to be as a result of incorrect assumptions made about the location of a tree belt and/or fence line to the west of the Danesfield.

12.11 The Green Belt boundary in this location should therefore be adjusted to remove our entire site from the Green Belt in order to ensure the soundness of the plan and policy P2: Green Belt.

Approach regarding Previously Developed Land

12.12 In the absence of any evidence base being produced by Guildford Borough Council, specific and detailed evidence demonstrating the case for concluding that the site at Send Marsh should be considered to be previously developed land (PDL) was submitted to Guildford Borough Council in February 2016.

12.13 The key points taken from the conclusion within this report set out that the report addressing the ‘Previously Developed Status of Land’ has been prepared, ‘specifically to correct the description of the site as pasture land.’ (And additionally as set out at paragraph 1.5 of the report in response to the fact that, ‘The Local Planning Authority now has a requirement to produce and maintain a register of previously developed land within its administrative area.’)

12.14 It is highlighted that, ‘There is no evidence of the site ever being in agricultural use in recent times. ‘It is considered that because of the history of previous uses of the site that it is to be regarded as Previously Developed Land, which increases its suitability for residential development. Other than the existing Green Belt designation, there are no other overriding constraints to the site which would prevent its early release for development.’ It is in the hands of a house builder and therefore it can be delivered without delay.
Settlement boundary of Send Marsh

12.15 Land at Polesden Lane and Send Marsh Road, Send Marsh is bordered on three sides by established housing and defensible boundaries including a footpath to the west (footpath number 46) and a second footpath to the north of the site (footpath number 45). It therefore lies within the effective framework of Send Marsh Village although it does not fall within the proposed settlement boundary as defined by the draft Local Plan.

12.16 As demonstrated in these representations Land at Polesden Lane and Send Marsh Road, Send Marsh is a largely unconstrained site in a sustainable location which is available immediately for development.

Incorrect Assumptions in the Sustainability Appraisal

12.17 Although the spreadsheet which accompanies Table C of Appendix IV of the Sustainability Appraisal was not made available for the full six week consultation period an initial assessment of this appraisal highlights significant inaccuracies in the information utilised to assess our client’s site.

12.18 In particular ‘Land north of Send Marsh’ is incorrectly identified as being located within Flood Zone 3 and not being previously developed land. The site is therefore given a red ranking against these categories in the site options appraisal.

12.19 The Council has previously been presented with evidence to demonstrate that the site is not at risk of flooding and significant evidence “to support the case for the site being Previously Developed Land.”

12.20 Based on the classifications set out in Table C and the accompanying spreadsheet it would appear that the Council has failed to take these representations and previously submitted information into account and no assessment of this evidence appears to have taken place.

12.21 Using accurate information to assess our client’s site, ‘Land north of Send Marsh’ ranks joint second out of all of the sites assessed in Send Marsh for housing use with a total of 11 green rankings.

12.22 It is therefore apparent that ‘Land north of Send Marsh’ performs strongly when assessed against the 21 categories that the Council have opted to appraise all reasonable site options against.

12.23 In order to minimise any potential for legal challenge to the Local Plan process, the SA should therefore be updated to take the above points into consideration and demonstrate how all reasonable alternatives have been considered in order to ensure the soundness of the plan.

Conclusion

12.24 The application of the approach in our Green Belt Assessment and evidence presented in our previously developed land report demonstrates that inter alia on the basis the site would provide for around 70 dwellings that our site should therefore be allocated for residential development. This approach would ensure the soundness of the plan and in particular policies S2: Borough Wide Strategy, P2: Green Belt and D4: Development in urban areas and inset villages.
Garlick’s Arch

1.27 Garlick’s Arch at 400 homes, represents an approximate increase of 56% on the total household numbers in Send Marsh / Burntcommon. This can only be considered to be ‘substantial growth’. The size of the allocated site and the number of new dwellings proposed cannot be considered to represent a ‘proportionate extension’ of the village but rather representative of substantial growth.

1.28 Policy A43 and the allocation of ‘Land at Garlick’s Arch, Send Marsh, Burnt Common and Ripley’ is therefore contrary to the settlement hierarchy established in the evidence base for the emerging Local Plan and its inclusion in the Local Plan is therefore considered to be unsound.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7982  Respondent: 15256225 / Boyer (Michelle Thomson)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Overview

9.1 This section provides an overview and assessment of the relevant allocated sites which are currently set out in the Proposed Submission Local Plan: Strategy and Sites June 2016.

9.2 In total the Proposed Submission Local Plan: Strategy and Sites June 2016 sets out a total of 37 allocated sites which relate to housing (C3) or mixed use redevelopment.

9.3 As set out in Section 4 of these representations the proposed allocations for housing delivery within the Borough rely heavily on strategic sites which are intended to deliver the majority of the overall OAN requirement.

9.4 Key sites also allocated within Send Marsh include site allocation numbers A43 and A43a which relate to ‘Land at Garlicks Arch, Send Marsh, Burnt Common and Ripley’ and ‘Land for new north facing slip roads to/from A3 at Send Marsh / Burnt Common’.

9.5 Further consideration of these sites are set out below

Land at Garlick’s Arch, Send Marsh, Burnt Common and Ripley

9.6 ‘Land at Garlick’s Arch, Send Marsh, Burnt Common and Ripley’ is allocated for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) as set out in Policy A43 of the Proposed Submission Local Plan: Strategy and Sites June 2016.
9.7 The site is approximately 30 ha in size and is stated to have an existing use of paddock and builder’s yard. This includes Grade 2 agricultural land as set out in the spreadsheet which accompanies Table C – Site Options Appraisal of Appendix IV of the Sustainability Appraisal (SA).

9.8 It is noted that this ‘site’ was not previously included in the Regulation 18 consultation for the emerging Local Plan and has been included at a very late stage in the development process of the Local Plan. The draft of the plan presented to the Executive Advisory Board on 13th April 2016 did not include the Garlick’s Arch. By the time the plan was considered at the Extraordinary Council meeting on 24th May 2016, it had been added.

9.9 ‘Land around Burnt Common Warehouse’ which was the previously allocated strategic site in the Regulation 18 consultation has now been removed from the proposed allocations.

9.10 Section 9 of these representations considers the performance of ‘Land at Garlick’s Arch, Send Marsh, Burnt Common and Ripley’ in the Sustainability Appraisal. This illustrates that the site performs poorly when compared to the other sites considered for Send and Send Marsh against several criteria including flood risk, distance from nearby amenities including schools, railway stations and recreational facilities. In addition the site is also categorised in the Sustainability Appraisal as high quality agricultural land and not previously developed land which also contributes to its poor performance against the appraisal criteria.

9.11 Send Marsh/Burntcommon is designated as a ‘large village’ which is defined in the ‘Guildford Borough Settlement Hierarchy’ as being “unsuitable for substantial growth but capable of accommodating a proportionate extension.”

9.12 The office for national statistics breaks down the 2011 Census records into various neighbourhood areas. The relevant areas in relation to our site are:

• Neighbourhood Area Guildford 001D – Burnt Common
• Neighbourhood Area Guildford 001E – Send Marsh.

9.13 The statistics for these areas show that there are 456 households in Send Marsh and 505 in Burnt Common. Based on the mid 2011 population estimates this gives an average of 2.68 people per household across both neighbourhood areas.

9.14 Using the Council’s population figure of 1,931 from 2011 for Send Marsh / Burntcommon and applying this 2.68 average then there are estimated to be approximately 720 households in Send Marsh / Burntcommon.

9.15 Garlick’s Arch at 400 homes therefore, represents an approximate increase of 56% on the total household numbers in Send Marsh / Burntcommon. This can only be considered to be ‘substantial growth’. The size of the allocated site and the number of new dwellings proposed cannot be considered to represent a ‘proportionate extension’ of the village but rather representative of substantial growth.

9.16 Policy A43 and the allocation of ‘Land at Garlick’s Arch, Send Marsh, Burnt Common and Ripley’ is therefore contrary to the settlement hierarchy established in the evidence base for the emerging Local Plan and its inclusion in the Local Plan is therefore considered to be unsound.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Land for new north facing slip roads to/from A3 at Send Marsh / Burnt Common’.

9.17 ‘Land for new north facing slip roads to/from A3 at Send Marsh / Burnt Common’ is allocated under Policy A43a in the Proposed Submission Local Plan: Strategy and Sites June 2016 for the delivery of a new northbound on-slip and a new southbound off-slip to and from the A3 trunk road to and from the A247 Clandon Road.

9.18 As with Policy A43 this site was not previously included in the Regulation 18 consultation for the emerging Local Plan and has been included at a very late stage in the development process of the Local Plan. As with the Garlick’s Arch site above, the draft of the plan presented to the Executive Advisory Board on 13th April 2016 did not include these slip roads. By the time the plan was considered at the Extraordinary Council meeting on 24th May 2016, it had been added.

9.19 As a consequence of this late inclusion of the site within the Proposed Submission Local Plan: Strategy and Sites June 2016 the Council have failed to comply with the requirements of the National Planning Practice Guidance (NPPG) in relation to the preparation of the sustainability appraisal.

9.20 Paragraph 005 (Reference ID 11-005-20140306) of the ‘Strategic Environmental Assessment and Sustainability Assessment’ section of the NPPG sets out the requirement for a sustainability appraisal to be produced during the preparation of a Local Plan.

9.21 The NPPG is clear that the “local planning authority must carry out an appraisal of the sustainability of the proposals.” This is designed to “help the authority to assess how the plan will contribute to the achievement of sustainable development” and “applies to any of the documents that can form part of a Local Plan, including core strategies, site allocation documents and area action plans.”

9.22 The land allocated as part of Policy A43a of the Proposed Submission Local Plan: Strategy and Sites June 2016 is not included or assessed as part of the Sustainability Appraisal which has been prepared in support of the emerging Local Plan.

9.23 The Council therefore cannot demonstrate that they have thoroughly or rigorously assessed the sustainability of the proposals contained within the Proposed Submission Local Plan: Strategy and Sites June 2016 and cannot fully determine how the plan will contribute to the achievement of sustainable development in the absence of this assessment.

9.24 In the absence of a Sustainability Appraisal for this site, the inclusion of Policy A43a within the Proposed Submission Local Plan: Strategy and Sites June 2016 cannot be considered to be justified or sound.

9.25 Furthermore, the site at Garlick’s Arch and associated slip roads (site references A43 and A43a) fall under several ownerships, increasing the difficulties in bringing forward this site, further emphasising the likelihood of delays in the delivery of these sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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11.16 Policy D1 of the Proposed Submission Local Plan requires “all new developments to achieve high quality design and enhance the environment in which they are set.”

11.17 Whilst the requirement for ‘high quality design’ by the Council is supported and is in accordance with Paragraph 56 of the NPPF which “attaches great importance to the design of the built environment” (Paragraph 56) it is noted that the NPPF states that “it is important to plan positively for the achievement of high quality inclusive design” (Paragraph 57).

11.18 The Council is therefore seeking to apply a much greater requirement on new development in respect of design than is set out in the NPPF by requiring proposals to not only “achieve high quality design” but also “enhance the environment in which they are set”. This requirement is more closely aligned to the protection given to historic environments which as set out in Policy D3 of the Proposed Submission Local Plan should be ‘conserved and enhanced’.

11.19 No suitable justification has been provided by the Council to support this approach and as such the wording of Policy D1 should be revised to align with the requirements of the NPPF and not afford all development sites the same level of status as heritage assets, which are dealt with in Policy D3.

11.20 As set out previously in these representations whilst the insertion of ‘Policy D4: Development in urban areas and inset villages’ is supported it is considered that the wording of the Policy should be revised to avoid unnecessary duplication with other policies in the Local Plan.

11.21 In particular Policy D4 requires new development to “conserve locally and nationally important heritage assets and conserve and enhance their settings” however this matter is addressed explicitly in ‘Policy D3: Historic environment’ which relates to all developments not just those in urban areas and inset villages.

11.22 Policy D4 also requires new development to have “no unacceptable effect on the amenities enjoyed by the occupants of buildings in terms of privacy, noise, vibration, pollution, dust, smell and access to sunlight and daylight.”

11.23 Whilst there is no objection raised to the requirements of this text from Policy D4 it is noted that Policy D4 is explicitly stated to relate to ‘urban areas and inset villages’. This amenity requirement should be applicable to all forms of development within the Borough and as such should be incorporated into a different policy such as Policy D1.

11.24 The additional repetition of matters addressed elsewhere in the policies of the Local Plan is unnecessary and unjustified. The policies in the Proposed Submission Local Plan should therefore be revised accordingly.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4</td>
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1.21 As set out in draft Policy P2 of the Proposed Submission Local Plan: Strategy and Sites June 2016 the following villages are now proposed to be inset from the Green Belt: Chilworth, East Horsley, Effingham, Fairlands, Flexford, Jacobs Well, Normandy, Peasmarsh, Ripley, Send, Send Marsh/Burnt Common, Shalford, West Horsley and Wood Street Village.

1.22 The approach of the Council to respond to the changes in national policy in respect of the Green Belt designation and to protect these areas using development management policies in accordance with the NPPF are supported.

1.23 The addition of ‘Policy D4: Development in urban areas and inset villages’ in the latest draft of the Local Plan which seeks to “promote the efficient use of land” whilst ensuring that “this does not negatively impact upon the quality of the local environment” is also supported.

1.24 Land at Polesden Lane and Send Marsh Road, Send Marsh is bordered on three sides by established housing and defensible boundaries including a footpath to the west (footpath number 46) and a second footpath to the north of the site (footpath number 45). It therefore lies within the effective framework of Send Marsh Village although it does not fall within the proposed settlement boundary as defined by the draft Local Plan.

1.25 Given the evidence presented in previous sections relating specifically to our client’s site at Polesden Lane, Send Marsh with regards to its contribution to the Green Belt and its previously developed land status, the location of the settlement boundary should be re-drawn around the entire site.

1.26 The application of the approach in our Green Belt Assessment and evidence presented in our previously developed land report demonstrates that inter alia on the basis the site would provide for more than 25 dwellings that our site should therefore be allocated for residential development. This approach would ensure the soundness of the plan and in particular policies S2: Borough Wide Strategy, P2: Green Belt and D4: Development in urban areas and inset villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17664  Respondent: 15256225 / Boyer (Michelle Thomson)  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

11.3 Policy H2 of the Proposed Submission Local Plan states that affordable housing will be provided:

“on sites providing five or more homes, or sites of 0.17 ha or more regardless of the number of homes. At least 40 per cent of the homes on these sites must be affordable homes; and On development providing solely affordable housing either on public sector-owned land or developments by registered providers”

11.4 This is contrary to the recent national guidance published in the National Planning Practice Guidance which states that “contributions should not be sought from development of 10 units or less, and which have a maximum combined gross floorspace of no more than 1000 sqm” (Paragraph 31; Reference ID: 23b-031-20160519).

11.5 Policy H2 does not therefore comply with current planning guidance and the Council has failed to provide any justification to support this approach.
11.6 In addition no justification has been provided for the 0.17ha threshold which the Council has set out in this policy and it is noted that the ‘Guildford Borough Council Local Plan Viability & Affordable Housing Study’ which is a key evidence document in relation to this policy was produced in December 2014 prior to the production of the ‘West Surrey Strategic Housing Market Assessment’ in September 2015.

11.7 For the Local Plan to be found sound at examination the Council should therefore demonstrate how this policy has taken into account the latest SHMA and NPPG Guidance.

11.8 The wording of Policy H2 should also be revised. The proposed wording set out in the Proposed Submission Local Plan states that “The tenure and size of affordable homes provided on each qualifying site must contribute, to the Council’s satisfaction, towards meeting the mix of affordable housing needs identified in the Strategic Housing Market Assessment 2015, or subsequent affordable housing needs evidence.”

11.9 The term ‘to the Council’s satisfaction’ is not a technically defined term and introduces ambiguity into the assessment and determination of future planning applications. The wording of Policy H2 should therefore be revised to remove this phrase and ensure the policy is justified.

11.10 Further consideration should also be given to the wording of the supporting text which relates to Policy H2. In particular paragraph 4.2.39 states that developments will be expected “to provide the required amount of affordable housing in accordance with this policy and Guildford Planning Contributions Supplementary Planning Document (SPD).” However paragraph 4.2.37 states that the Planning Contributions Supplementary Planning Document 2011 will be revised.

11.11 The Council should therefore demonstrate how this policy will be implemented in the absence of an updated Planning Contributions Supplementary Planning Document and set out the proposed timetable for these works to ensure the soundness of the plan.

11.12 Given that the Council have not yet adopted a Community Infrastructure Levy (CIL) Charging Schedule for the Borough the Council should also demonstrate how the affordable housing requirement set out in Policy H2 takes into account this potential additional cost to development.

11.13 It is noted that the ‘Preliminary Draft Charging Schedule’ for the Borough was consulted on between January and March 2015 after the production of the ‘Guildford Borough Council Local Plan Viability & Affordable Housing Study’.

11.14 The Council should therefore justify this approach to demonstrate that the affordable housing requirements set out in Policy H2 are underpinned by a robust viability appraisal across the Borough.

11.15 Policy H2 also fails to make any reference to ‘Starter Homes’ which it is considered should be a consideration of the Proposed Local Plan given the timetable for examination and adoption. To ensure the soundness of the plan it is recommended that reference to ‘Starter Homes’ is made to ensure the Local Plan is not out of date in policy terms upon adoption.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>PSLPP16/17666</th>
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11.25 Policy I1 sets out that to support the delivery of the Local Plan “infrastructure needed to support development should be provided and available when first needed to serve the occupants and users of the development.”

11.26 In addition the Policy states that “the key infrastructure to support the delivery of this Plan is provided in the Infrastructure Schedule at Appendix C. The Local Plan also includes land allocated for infrastructure.”

11.27 The Infrastructure Schedule set out in Appendix C lists the two slips roads allocated under Policy A43a of the Proposed Submission Local Plan under references SRN9 and SRN10.

11.28 In accordance with the wording of Policy I1 these are therefore considered to represent ‘key infrastructure’ which is required to support the delivery of the development identified in the Local Plan.

11.29 Our transport consultants Odyssey Markides have confirmed however that it is surprising “that the A3 slip roads required under ‘Site A43a’ are not directly linked to the delivery of ‘Site A43’ (Garlick’s Arch)…as it is considered that both are reliant upon each other for their requisite delivery; this is not apparent from either site’s policy or their timescales for delivery.”

11.30 As identified in Section 8 of these representations the land allocated under Policy A43a has not been included within the Council’s sustainability appraisal for the Local Plan. As such the inclusion of this site within the Local Plan is considered to result in the Local Plan being unable to demonstrate that it is sound for the purposes of examination and adoption.

11.31 Policy A43a should therefore be removed from the Local Plan and Policy I1 and Appendix C revised accordingly to take into account the removal of this site.

11.32 In contrast our transport consultants Odyssey Markides have confirmed that “the scale of development earmarked for the Polesden Lane site, at up to just 70 dwellings, cannot be considered to lead to a ‘severe’ traffic impact as per the NPPF under any scenario. Indeed, it can be delivered easily with simple connections to the existing highway network rather than being reliant upon significant works to be delivered over a long time period over which there may not be the means to easily control and enable their delivery.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/17656  **Respondent:** 15256225 / Boyer (Michelle Thomson)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Green Belt Assessment

1.10 Significant limitations in Guildford’s approach to their Green Belt Assessment have been identified. Given the need for the evidence base to be sound, Boyer has carried out an independent assessment of the PDAs and MPDAs around Send and Send Marsh as identified in the Council’s GBCS to supplement the GBCS based on guidance published by the Planning Advisory Service (PAS) and the approach of other Local Planning Authorities. This was provided to Guildford Council on 11th March 2016.

1.11 The full report is included at Appendix Three to these representations (which has been updated to refer to the site allocations within the Proposed Submission Local Plan.)

1.12 First, the GBCS considers that a land parcel either contributes or not to a specific Green Belt purpose (i.e. with the parcel scoring either 1 or 0) without providing any quantification or the degree of that contribution (for example the extent to which a land parcel may make towards a particular Green Belt purpose).

1.13 Second, as a result of this first limitation, the methodology of the GBCS does not allow for any detailed form of ranking to assess the relative contribution each land parcel makes towards the purposes of including land within the Green Belt. The GBCS did not therefore carry out any form of comparative assessment between the identified PDAs/MDPAs.

1.14 Notwithstanding this, the GBCS does identify a number of small PDAs that are considered not to significantly compromise the land parcel score as a whole. These have included sites that have subsequently been proposed as site allocations or safeguarded sites within the previous draft Local Plan (2014) (site references 74-76). Our client’s site was previously identified as safeguarded land (site reference 120).

1.15 Boyer has adopted a scoring methodology to address these issues and quantify the contribution made by each PDA/MPDA towards the purposes of including land within the Green Belt. The aim is to build upon the methodology of the GBCS by enabling a comparison between potential sites already identified through the Local Plan process.

1.16 This approach, together with the sustainability methodology adopted within the GBCS, has been applied to the 11 PDAs/MPDAs surrounding Send, Send Marsh & Burntcommon and Ripley.

1.17 This assessment concludes that the site, at best, makes only a very limited contribution to the purposes of including land within the Green Belt. When compared with the PDAs/MPDAs assessed, it is ranked joint top (i.e. contributes least to the Green Belt) along with land south of Burntcommon. It is considered therefore that its release from the Green Belt would not have any adverse impact on the purpose and function of the Green Belt in this part of the Borough and as such there are no overriding constraints to prevent early delivery of the site.

Previously Developed Land

1.18 The broad approach to removing major previously developed sites from the Green Belt accords with national planning policy and is supported. However, the evidence base to support Guildford’s assumptions about the sites considered to be previously developed appears to be somewhat lacking. There are no details as to the methodology or reasoned justification that has been applied to demonstrate that a site should be considered as previously developed land.

1.19 In the absence of any evidence base being produced by Guildford Borough Council, specific and detailed evidence demonstrating the case for concluding that the site at Send Marsh should be considered to be previously developed land (PDL) was submitted to Guildford Borough Council in February 2016. This report is entitled, ‘Land at Polesden Lane and Send Marsh Road, Send Marsh, Previously Developed Status of Land’ and is attached again at Appendix Four to this representation.

1.20 It is therefore of fundamental importance that the Council demonstrates that the proposed approach with regards to both Green Belt and subsequently previously developed land in the Green Belt is supported by a robust evidence base in order to demonstrate it has appropriately considered all reasonable alternatives to ensure the plan and policies P2: ‘Green Belt’ and D4: ‘Development in urban areas and inset villages’ are sound.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3.10 Paragraph 79 of the NPPF confirms that, ‘The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.’

3.11 Paragraph 80 then sets out the five purposes of the Green Belt i.e.

- ‘To check the unrestricted sprawl of large built-up areas;
- To prevent neighbouring towns merging into one another;
- To assist in safeguarding the countryside from encroachment;
- To preserve the setting and special character of historic towns; and
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.’

3.12 Paragraph 83 of the NPPF refers to the Green Belt boundaries and sets out that, ‘Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.’

3.13 Paragraph 84 then goes onto say that, ‘When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.’

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Background to Green Belt position

6.1 Page 22 of Guildford’s Corporate Plan 2015 – 2020 identifies the following action relating to the Green Belt, ‘Protect sensitive greenbelt land and Areas of Outstanding Natural Beauty and designate new SANGS (Suitable Alternative Natural Green Spaces)’.

6.2 The Green Belt and Countryside Study (GBCS) produced by Guildford Borough Council, consisting of 6 volumes (and including the Volume II addendum and re-issue of Volume IV) is a key piece of evidence informing the strategy of this emerging Local Plan. As part of the GBCS, the evidence base now includes a Green Belt sensitivity map, which colour codes parcels of the Green Belt into green, yellow and red, depending on the parcels’ contribution to the green belt, with green meaning a lesser contribution and red meaning the greatest contribution.

Proposed approach

6.3 Paragraph 4.4 of the officer report to the Extraordinary Council meeting confirms that, ‘Alongside the detailed considerations carried out as part of the Sustainability Appraisal process, the sensitivity map has been used as a further targeted constraint in arriving at the amended proposal sites…’

6.4 The general approach to the release of land from the Green Belt is supported i.e. an assessment of the existing Green Belt has been undertaken, based on the division of the existing Green Belt into parcels and an assessment made as to the contribution of each of these parcels against the five purposes of the Green Belt as set out in the NPPF.

6.5 It is however critical that this assessment is based on a sound evidence base. As background, the GBCS identified a number of Potential Development Areas (PDAs) and Major Potential Development Areas (MPDAs) for assessment against the purposes of including land within the Green Belt.

6.6 Significant limitations in Guildford’s approach to their Green Belt Assessment have been identified. Given the need for the evidence base to be sound, Boyer has carried out an independent assessment of the PDAs and MPDAs around Send and Send Marsh as identified in the Council’s GBCS to supplement the GBCS based on guidance published by the Planning Advisory Service (PAS) and the approach of other Local Planning Authorities. This was provided to Guildford Council on 11th March 2016.

6.7 The full report is included at Appendix Three to these representations (which has been updated to refer to the site allocations within the Proposed Submission Local Plan. However, it is clear that the GBCS has significant limitations that have been addressed in the report with a view to assisting the Council and strengthening the Local Plan evidence base.

6.8 First, the GBCS considers that a land parcel either contributes or not to a specific Green Belt purpose (i.e. with the parcel scoring either 1 or 0) without providing any quantification or the degree of that contribution (for example the extent to which a land parcel may make towards a particular Green Belt purpose).

6.9 Second, as a result of this first limitation, the methodology of the GBCS does not allow for any detailed form of ranking to assess the relative contribution each land parcel makes towards the purposes of including land within the Green Belt. The GBCS did not therefore carry out any form of comparative assessment between the identified PDAs/MDPAs.

6.10 Notwithstanding this, the GBCS does identify a number of small PDAs that are considered not to significantly compromise the land parcel score as a whole. These have included sites that have subsequently been proposed as site allocations or safeguarded sites within the previous draft Local Plan (2014) (site references 74-76). Our client’s site was previously identified as safeguarded land (site reference 120).
6.11 Boyer has adopted a scoring methodology to address these issues and quantify the contribution made by each PDA/MPDA towards the purposes of including land within the Green Belt. The aim is to build upon the methodology of the GBCS by enabling a comparison between potential sites already identified through the Local Plan process.

6.12 This approach, together with the sustainability methodology adopted within the GBCS, has been applied to the 11 PDAs/MPDAs surrounding Send, Send Marsh & Burntcommon and Ripley.

6.13 This assessment concludes that the site, at best, makes only a very limited contribution to the purposes of including land within the Green Belt. When compared with the PDAs/MPDAs assessed, it is ranked joint top (i.e. contributes least to the Green Belt) along with land south of Burntcommon. It is considered therefore that its release from the Green Belt would not have any adverse impact on the purpose and function of the Green Belt in this part of the Borough.

6.14 The site is adjacent to the village settlement boundary to the north, east and south and is therefore largely within the existing village envelope. The smaller part of the northern boundary, and the western boundary, adjoin fields but these boundaries comprise of strong and mature landscaping.

6.15 Overall, the site is bordered by established housing and defensible boundaries. It therefore has an enclosed character that is visually contained and separate from the wider countryside beyond. Furthermore, the Site’s western boundary does not extend much beyond the western edge of the existing settlement and does not therefore fall clearly within any identifiable gap between Send and Send Marsh.

6.16 The landscape character assessment by FLA (Appendix 5 of our Green Belt Assessment) concludes as follows:

6.17 “The previous land use for Kennels and other sui-generis uses suggest that the areas landscape character relates more to the village fringe than that of the more open land to the west. Therefore, I consider that this is an in-fill site which relates well to the historic field pattern and although the area does lie on the western edge of the village of Send Marsh, it does not form part of the open land to the west which is part of the gap between the two village settlements.”

6.18 The site is easily accessible to a range of facilities within Send and Send Marsh including The Village Medical Centre, St Bede’s Junior School, The Saddlers public house and Send Village Hall. In these terms it compares favourably with other PDAs/MPDAs, especially those surrounding Send Marsh & Burntcommon and Ripley. This combination of good access to facilities and a high degree of separation and containment from adjoining countryside means that the site represents a logical extension to Send Marsh.

6.19 In light of the characteristics of the site and the Council’s recognition that there is a need for Green Belt release to meet the proposed housing target, we consider that the site should be removed from the Green Belt and allocated for new residential development through the emerging Local Plan.

Comparative Assessment

6.20 The table below identifies the eight PDAs at Send Marsh, Send and Ripley as defined within the GBCS. However, this table provides Boyer’s assessment of each site against Green Belt purposes and, using the Boyer methodology, allows their relative contribution against each purpose to be assessed and for the sites to be ranked accordingly.

<see attachments for table 1>

6.21 As stated above, the site is ranked joint top (i.e. contributes least to the Green Belt) along with land south of Burntcommon. We conclude that its release from the Green Belt would not have any adverse impact on the purpose of the Green Belt in this part of the Borough.

6.22 The attached Green Belt assessment highlights the significant limitations within the Council’s GBCS in terms of the methodology used. Our attached Green Belt assessment also adopts a more refined approach to the review of the Green Belt which is considered necessary to the make both the assessment and the emerging Local Plan sound.

6.23 Whilst the principal of illustrating how areas meet the Green Belt purposes is welcomed, i.e. through the Green Belt Sensitivity Map, the background information informing this must be robust.
6.24 Our Green Belt Assessment has clearly demonstrated that our site, ‘at best, makes only a very limited contribution to the purposes of including land within the Green Belt.’ It is therefore clear that in order to ensure the soundness of the plan, the evidence supporting the release of Green Belt land and subsequently informing the Green Belt sensitivity map must be revisited and the study updated to take into account the recommendations regarding the revised methodology informing the Council’s Green Belt Assessment.

6.25 Policy P2: Green Belt, sets out that, ‘We will continue to protect the Metropolitan Green Belt, as shown on the proposals map, against inappropriate development…’ As set out in paragraph 85 of the NPPF, ‘When defining boundaries, local planning authorities should…not include land which it is unnecessary to keep permanently open…’

6.26 The inadequacies of the Council’s Green Belt Assessment, as identified within our Green Belt Assessment result in the approach to release of land from the Green Belt being fundamentally flawed and not based on a sound evidence base.

6.27 By revisiting the evidence base to justify the release of land within the Green Belt, as detailed above and adopting the approach as advised which accords with both PAS guidance and best practice, it is clear as robustly demonstrated by our Green Belt Assessment, inter alia, that our site should be removed from the Green Belt.

6.28 In order to ensure the soundness of the plan, it is therefore recommended that the methodology is updated in accordance with our Green Belt Assessment and in accordance with this updated evidence, the Proposals Map illustrating the Green Belt boundaries is updated to reflect these findings.

6.29 In addition to the above Green Belt boundary reviews, there are also some more refined adjustments proposed to the Green Belt boundaries. Paragraph 6.9 of the Guildford Borough Green Belt and Countryside Study summary document, dated January 2013 sets out that,

‘There are some instances where the proposed Green Belt boundaries of a village, as set out in Volume IV, might appear to go beyond the existing built up or settlement boundary, suggesting that a PDA has been assumed to be included. This is not the case. The reason for the proposed Green Belt boundaries sometimes not directly following the built up part of a village, is in order to adhere to the NPPF guidance on such boundary lines. This requires at paragraph 85 that boundaries follow physical features that are readily recognisable and likely to be permanent. As explained at 5.6 above, the inclusion of land within a village boundary that is inset from the Green Belt does not automatically imply that development would be acceptable, with other relevant planning policies still applying to any development proposals.’

6.30 The revised Green Belt boundary around the site at Polesden Lane, Send Marsh does not accord with the above methodology.

6.31 Volume IV of the Greenbelt and Countryside Study assesses the potential for insetting villages across Guildford Borough Council which are currently ‘washed over’ by the Green Belt designation.

6.32 The assessment maps relating to Send Marsh / Burntcommon identify a ‘fence line and treebelt located to the west of Danesfield and to the north of Send Barns Road’. This is identified by Reference 3M.

6.33 Contrary to this statement there is no fence line or tree belt which runs in a diagonal north-west to south east direction across the site.

6.34 The proposed insetting boundary for the Green Belt in this location does not therefore adhere to the NPPF guidance on these boundaries and fails to follow a physical feature which is recognisable or permanent.

6.35 To ensure it is consistent with this approach and follows boundaries that are ‘readily recognisable’, the entire site should therefore be removed from the Green Belt. This approach would also accord with the assessment and conclusions in the Green Belt Assessment carried out by Boyer.

6.36 It is therefore recommended that the Green Belt boundary in this location is adjusted to remove the entire site from the Green Belt and follow physical, recognisable and permanent features as set out in the NPPF. These alterations would help ensure the soundness of the plan and the soundness of policy P2: Green Belt.

Safeguarding land
6.37 Paragraph 4.64 to 4.66 of the Council’s Topic Paper: Green Belt and the Countryside June 2016 sets out the following with regards to safeguarded land:

‘The NPPF is clear that when amending Green Belt boundaries we should have regard to their intended permanence so that they are able to ensure beyond the plan period. In doing so, we should safeguard sites in order to meet longer-term development needs. Safeguarded land is therefore safeguarded for future development, not from development.’

The draft Local Plan (2014) included approximately 200ha of safeguarded land around some of our villages and at one traveller site. As part of reconsidering our spatial strategy, we have looked again at the issue of safeguarding. The NPPF states at paragraph 85 (bullet 3):

‘where necessary, identify in their plans areas of ‘safeguarded land’ between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period’ (emphasis added)

The NPPF is therefore explicit that safeguarded land should be on the edge of the urban area. This is consistent with the fundamental aim of Green Belt policy, which is to prevent urban sprawl. We have therefore considered the extent to which safeguarded land could be identified around Guildford urban area. Given the significant constraints that exist to the north and south of the borough (Thames Basin Heaths Special Protection Area and Surrey Hills Area of Outstanding Natural Beauty), we are left with a ribbon across the central part of the borough that remains potentially suitable for development.

6.38 Paragraph 4.67 then sets out that, ‘Safeguarded land is required in order to ensure that, once amended, Green Belt boundaries need not be reviewed at the end of every plan period. It therefore adds certainty and is consistent with their intended permanence. However, given the nature of our borough and the extent to which constraints limit development opportunities, we no longer consider that safeguarding is appropriate for Guildford. In order to be consistent with the NPPF, any safeguarded land would need to be on the edge of Guildford urban area and would need to be of a sufficient scale to negate the need for a Green Belt review until ‘well beyond the plan period’.

6.39 The ‘urban area’ should not be restricted to Guildford; there are other settlements which are considered to be both sustainable and suitable for development and such settlements, which include Send and Send Marsh should be considered for safeguarding land. Without applying such an approach to safeguarded land it will not be possible to comply with paragraph 83 of the NPPF, which sets out that

‘Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they are capable of enduring beyond the plan period.

6.40 Indeed, Guildford Borough Council has already recognised that the failure to safeguard land is likely to necessitate further Green Belt releases. This position is acknowledged at paragraph 4.70 of the Green Belt and the Countryside Topic Paper, which confirms that, ‘We consider that any future local plan would also need to consider a combination of spatial options if needs were to be met, and is therefore likely to necessitate further Green Belt release around the villages.’

6.41 It is therefore concluded that Guildford’s approach with regards to the safeguarding of land is neither effective nor justified and cannot be considered to be sound.

6.42 Contrary to the position adopted in the Topic Paper, the constraints referred to that are limiting the development opportunities are the very reason that land should be safeguarded. I.e. it is acknowledged that the Green Belt is a significant constraint.

6.43 Furthermore, the safeguarding of land should not apply only to land around Guildford Urban Area, but should be informed by a robust Green Belt Assessment where all settlements are considered, particularly those such as Send Marsh, which has been identified as a large village suitable for growth.

6.44 This is demonstrated in the Guildford Borough Settlement Profiles which states that ‘due to its proximity and relationship with Send in terms of sharing facilities there is scope for Send Marsh/Burntcommon to support additional housing development in the future through an extension if suitable sites are found.”
6.45 Referring back to the matters addressed above regarding the Green Belt Assessment, it is therefore of fundamental importance that the Council’s Green Belt Assessment follows a robust methodology in order to ensure it has appropriately considered all reasonable alternatives and can identify land to be safeguarded in order to be justified and ensure the plan and policy P2: Green Belt is sound.

Other comments

6.46 The ‘Green Belt and the Countryside’ Topic Paper highlights that two documents were amended/produced to contribute to the Council’s Green Belt and Countryside Study (GBCS). These documents were firstly Volume II addendum, which amended the way that the land parcels were scored in relation to two Green Belt purposes. Secondly it relates to the preparation of Volume V of the GBCS which sought to assess a number of further spatial strategy options.

6.47 Paragraph 4.85 of the ‘Green Belt and the Countryside’ Topic Paper sets out that, ‘Both these documents were published in April 2014, by which stage the spatial strategy for the draft Local Plan had been formed and there was insufficient time to be able to fully incorporate all the findings from the updated evidence.’

6.48 This demonstrates that insufficient regard has been had to all available evidence in formulating the spatial strategy and raises concerns that in fact the approach proposed is not based on a robust evidence base, and is not the best strategy as all reasonable alternatives have not been assessed. Without demonstrating that the proposed approach is supported by a robust evidence base, the plan cannot be said to be sound.

6.49 Policy P2: Green Belt is the main policy addressing Green Belt matters. A significant amount of the proposed policy is devoted to regurgitating national planning policy. This is not necessary and indeed unless all paragraphs are quoted word for word, the meaning as set out in the NPPF then becomes altered, without justification.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Background to Inset Villages

8.1 As set out in paragraph 4.3.12 of the supporting text which accompanies draft Policy P2 of the Proposed Submission Local Plan: Strategy and Sites June 2016 historically all of the villages with the exception of Ash Green and major previously developed sites have been “washed over by the Green Belt designation”.

8.2 With the publication of the National Planning Policy Framework (NPPF) in 2012 however the Government provided clear guidance in respect of the Green Belt and its essential characteristics and purposes.

8.3 In particular Paragraph 86 of the NPPF states that “If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other
reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt” (Our emphasis).

The Emerging Local Plan Response

8.4 In response to the NPPF the Council instructed further work to be undertaken in respect of their ‘Green Belt & Countryside Study’ to consider whether villages should be ‘inset’ or ‘washed over’ by the Green Belt designation.

8.5 As set out in draft Policy P2 of the Proposed Submission Local Plan: Strategy and Sites June 2016 the following villages are now proposed to be inset from the Green Belt: Chilworth, East Horsley, Effingham, Fairlands, Flexford, Jacobs Well, Normandy, Peasmarsh, Ripley, Send, Send Marsh/Burnt Common, Shalford, West Horsley and Wood Street Village.

8.6 The approach of the Council to respond to the changes in national policy in respect of the Green Belt designation and to protect these areas using development management policies in accordance with the NPPF are supported.

8.7 Therefore the addition of ‘Policy D4: Development in urban areas and inset villages’ in the latest draft of the Local Plan which seeks to “promote the efficient use of land” whilst ensuring that “this does not negatively impact upon the quality of the local environment” is also supported.

Settlement boundary around the site

8.8 Send Marsh comprises an enclave of established housing closely related to the larger village of Send to the west. The Danesfield development marked a significant change to the character of this part of Send Marsh, introducing a distinct element of estate housing in an area which previously had comprised ribbon housing and non-residential uses.

8.9 As such, the village clearly lends itself to residential development which will rationalise the existing situation creating a long-term defensible boundary without any material outwards projection of built development.

8.10 Land at Polesden Lane and Send Marsh Road, Send Marsh is bordered on three sides by established housing and defensible boundaries including a footpath to the west (footpath number 46) and a second footpath to the north of the site (footpath number 45). It therefore lies within the effective framework of Send Marsh Village although it does not fall within the proposed settlement boundary as defined by the draft Local Plan.

8.11 Paragraph 4.2 of the Green Belt and the Countryside Topic Paper sets out that, ‘Whilst the NPPF broadly represents a continuation of previous policy, there has been a significant change in the policy approach to villages. PPG2 had previously given a choice as to whether villages should remain washed over by the Green Belt or whether they should be inset (removed) from the Green Belt. This is in contrast to the NPPF, which requires that all villages that do not make an important contribution towards the openness of the Green Belt are inset.’

8.12 Paragraph 4.12 of the Topic Paper then confirms that, ‘Volume IV of the Green Belt and Countryside Study (GBCS) in 2012 assesses all of our villages and recommends that the following villages should be inset from the Green Belt:… Send, Send Marsh/ Burnt Common…’

8.13 The Council’s approach with regards to ‘inset villages’ is supported. However, given the evidence presented in previous sections relating specifically to our client’s site at Polesden Lane, Send Marsh with regards to its contribution to the Green Belt and its previously developed land status, the location of the settlement boundary should be re-drawn around the entire site.

8.14 Furthermore, based on the physical characteristics of the site, its usage and its containment it is considered that this site is fundamentally different from the open countryside to the west and north-west.

8.15 The site does not therefore represent pristine, high quality Green Belt land and its previous usage is visible in the character of the site itself and its interrelationship with the surrounding development.

8.16 The inclusion of the site within the settlement boundary would not therefore have any material adverse impact on Green Belt purposes and in particular its openness. The site clearly lends itself to residential development and would rationalise the existing built form creating a defensible village boundary to the west.
8.17 This was demonstrated during the examination of the current Local Plan which was adopted in 2003. As set out in paragraphs 10.4.174 – 10.4.178 of the Inspector’s report the site was put forward on the basis that it had “advantages of being a brownfield site, closely related to a settlement in which there was a reasonable provision of facilities.” The Inspector appeared to agree with this statement noting that “were there a need (for further housing) this site would have features that would make it worthy of consideration.”

8.18 The new Local Plan seeks to identify and meet the needs of the Borough in respect of housing and seeks to provide for the delivery of 13,860 additional homes by 2033.

8.19 As set out above our client’s site would meet this requirement and would provide a proportionate and logical extension to the village whilst contributing to the housing needs of the Borough.

8.20 Whilst the re-alignment of the Green Belt boundary in relation to the Village of Send Marsh as set out in Section 6 is welcomed, given the evidence presented in previous sections relating to the fact that, at best the site makes only a limited contribution to the Green Belt and evidence demonstrating the previously developed status of the land, in order to ensure the soundness of the plan and policy D4: Development in urban areas and inset villages, the settlement boundary should be redrawn around the entire site.

8.21 The application of the approach in our Green Belt Assessment and evidence presented in our previously developed land report demonstrates that inter alia on the basis the site would provide for more than 25 dwellings that our site should therefore be allocated for residential development. This approach would ensure the soundness of the plan and in particular policies S2: Borough Wide Strategy, P2: Green Belt and D4: Development in urban areas and inset villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Background

1.1 These representations have been prepared in response to the Guildford Borough Proposed Submission Local Plan: Strategy and Sites June 2016. This report takes into account earlier representations, as relevant, made to the Council in response to consultation on the emerging Local Plan and its supporting evidence base.

Progressing the plan

1.2 Guildford appears to have embraced national Government Advice, made clear within the Housing and Planning Act, to ensure that Local Plans are put into place as quickly as possible in order to facilitate much needed strategically planned growth, which is supported.

Meeting Objectively Assessed Housing Need

1.3 The spatial vision set out in the Proposed Submission Local Plan: Strategy and Sites identifies that the plan makes provision for the delivery of 13,860 additional homes by 2033. This represents the Council meeting its Objectively Assessed Need (OAN) per annum of 693 homes across the plan period 2013 – 2033.
1.4 In order to accommodate the full objectively assessed needs within the Borough, it is acknowledged by Guildford Borough Council that this is dependent on Green Belt releases. The proposed Green Belt releases have been informed by the Green Belt and Countryside Study (GBCS), which has been subject to further work since the last round of consultation on the Local Plan in July 2014.

1.5 Guildford’s commitment to achieving their full objectively assessed housing need is welcomed and supported.

Housing Trajectory

1.6 The Housing Trajectory demonstrates that there is a cumulative housing deficit up until 2027/2028 given the reliance on the delivery of complex/difficult strategic sites. This deficit reaches a peak in 2017/2018 (i.e. the year before the planned adoption of the plan) at an housing under provision of 2,019 dwellings based on the potential housing provision figures between 2013-2018.

1.7 In order to ensure the soundness of the plan there is a need to fill a gap in the early years of the plan period with a greater number of smaller sites where there is certainty that they can and will be delivered in the first five years of the plan period. This will ensure diversity of supply and ensure the plan accords with the requirements of paragraph 47 of the NPPF.

1.8 It has been demonstrated that our client’s site could deliver around 70 dwellings of both market and affordable housing within the first five years of the plan period which will contribute to meeting the extensive needs which exist within this area as well as within the Borough as a whole at the start of the plan period to ensure the soundness of the plan.

1.9 Land at Polesden Lane and Send Marsh Road, Send Marsh is a largely unconstrained site in a sustainable location which is available immediately for development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?


Comment ID: PSLPP16/17659 Respondent: 15256225 / Boyer (Michelle Thomson) Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Detailed policy matters

1.41 Several concerns regarding individual policies are highlighted, including the size of sites where affordable housing is sought, lack of account taken of started homes and onerous requirements regarding design policies.

1.42 The application of the approach in our Green Belt Assessment and evidence presented in our previously developed land report demonstrates that inter alia on the basis the site would provide for around 70 dwellings that the site in Send Marsh should therefore be allocated for residential development. This approach would ensure the soundness of the plan.
and in particular policies S2: Borough Wide Strategy, P2: Green Belt and D4: Development in urban areas and inset villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17661  Respondent: 15256225 / Boyer (Michelle Thomson)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

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Progressing the Plan

5.1 Guildford appears to have embraced national Government Advice, made clear within the Housing and Planning Act, to ensure that Local Plans are put into place as quickly as possible in order to facilitate much needed strategically planned growth. In this regard, Guildford’s commitment to progressing their Local Plan in line with Government Advice and the Housing and Planning Act is supported.

5.2 This commitment to progressing their Local Plan is demonstrated by the fact that Guildford has now progressed to a Regulation 19 consultation, which is also welcomed.

Approach to Objectively Assessed Need

5.3 Since the consultation of the Draft Guildford Borough Local Plan: Strategy and Sites in July 2014, as above, the West Surrey Strategic Housing Market Assessment (SHMA) was published in September 2015. The SHMA was produced jointly with Waverley and Woking as with Guildford, the three boroughs are considered to constitute an Housing Market Area.

5.4 The SHMA sets out that the objectively assessed housing need (OAN) for Guildford is 693 dwellings per annum.

5.5 Our clients have carried out an independent assessment of the objectively assessed need (see Appendix Six) which supports a case for a higher OAN. An OAN of 693 should therefore be treated as a minimum.

5.6 Guildford Borough Council has been clear that, ‘appropriate sustainable sites can be allocated within the plan to meet the OAN for both housing and employment’ (Executive Summary of the Full Council report dated 24 May 2016).

5.7 The plan period is now proposed as 2013 – 2033 and taking the OAN of 693 as set out in the SHMA, this equates to the provision of 13,860 dwellings in the plan period. Policy S2: Borough Wide Strategy confirms this position in the policy, setting out that, ‘During the plan period (2013 – 2033), we will make provision for 13,860 new homes…’

5.8 Of note is the fact that the Draft Guildford Borough Local Plan: Strategy and Sites published in July 2014 had a plan period of 2011 – 2031 and made provision for 13,040 new homes, which equated to an annual requirement of 652 new homes a year.

5.9 The final SHMA published in September 2015 states that it incorporates the 2012 CLG Household projections and other factors such as student growth.

5.10 Guildford’s commitment to achieving their full objectively assessed housing need is welcomed and supported.
Spatial Development Strategy

5.11 Paragraph 4.1.6 of the supporting text to Policy S2: Planning for the borough – our spatial development strategy sets out that:

‘Our preference is to focus growth in the most sustainable locations, making the best use of previously developed land (including in the Green Belt if appropriate). These locations are:

- Guildford town centre
- Urban areas
- Inset villages
- Identified Green Belt villages

5.12 Paragraph 4.1.8 goes on to set out that, ‘Whilst these sustainable locations are our preferred locations for new development, they are unable to accommodate all of the new development we need. We will therefore release allocated land for development in other areas. These include:

- Countryside beyond the Green Belt
- Urban extensions to Guildford and Ash and Tongham
- New settlement at the former Wisley airfield
- Development around villages (including some expansion).

5.13 It is assumed that villages such as Send Marsh and any associated boundary adjustments to the Green Belt in this area will then be considered under the ‘Inset villages’ part of Policy S2 and this approach is supported.

5.14 Furthermore the proposed settlement hierarchy for the Borough’s settlements is also supported as set out in the ‘Guildford Borough Settlement hierarchy’ which forms part of the evidence base for the Proposed Submission Local Plan: Strategy and Sites June 2016.

5.15 As set out in section 4.0 of the document entitled, ‘Guildford Borough Settlement Hierarchy’, (which refers to the ‘updated settlement hierarchy’), the sustainability ranking of the settlements designates Send Marsh/Burntcommon as a large village. Large villages are defined in the settlement hierarchy as being “unsuitable for substantial growth but capable of accommodating a proportionate extension.”

5.16 The justification for deviation from the sustainability scoring is supported, as is the rationalisation that the population size and proximity of the village to the services in East Horsley and Send result in Send Marsh/Burntcommon sitting more ‘comfortably’ with the other large villages within this category.

5.17 It is considered that the classification of Send Marsh is suitable and accurately reflects the characteristics and role/function of both the village and its interrelationship with the surrounding area.

5.18 The conclusions state that “it would be appropriate to direct new development towards…Send Marsh/Burntcommon” and other locations within the Borough which are considered to be “the most sustainable in terms of their level of community services and facilities, access to higher order centres and employment opportunities, and ability to support new development.”

5.19 This approach and the conclusions in relation to Send Marsh within the ‘Guildford Borough Settlement hierarchy’ are supported.

Strategy to Meet Objectively Assessed Need

5.20 The spatial vision set out in the Proposed Submission Local Plan: Strategy and Sites identifies that the plan makes provision for the delivery of 13,860 additional homes by 2033. This represents the Council meeting its Objectively Assessed Need (OAN) per annum of 693 homes across the plan period 2013 – 2033.

5.21 In order to accommodate the full objectively assessed needs within the Borough, it is acknowledged by Guildford Borough Council that this is dependent on Green Belt releases. The proposed Green Belt releases have been informed by
the Green Belt and Countryside Study (GBCS), which has been subject to further work since the last round of consultation on the Local Plan in July 2014.

5.22 This broad approach, which follows the spatial strategy as outlined above to enable the OAN to be met, is supported.

Housing trajectory

5.23 Notwithstanding the above support to the overall approach, there is concern over the deliverability of the housing. The Housing Trajectory identifies the potential housing provision over the plan period (2013 – 2033). This potential provision is broken down into the following five year periods: 1) Pre-adoption (2013 – 2018), 2) the first five years (2018 – 2023), 3) 6 – 10 years (2023 – 2028) and 4) 11-15 years (2028 – 2033).

5.24 What is clear from the Housing Trajectory is that there is a cumulative housing deficit up until 2027/2028 given the reliance on the delivery of complex/difficult strategic sites. This deficit reaches a peak in 2017/2018 (i.e. the year before the planned adoption of the plan) at an housing under provision of 2,019 dwellings based on the potential housing provision figures between 2013-2018.

5.25 This is a significant deficit and with a housing target of 693 dwellings per annum, equates to a deficit of almost 3 years housing provision at the point of adoption of the plan. Such a heavy reliance on strategic sites coming forward at the end of the plan period therefore makes the plan vulnerable.

5.26 The Plan should demonstrate a 5 year housing land supply at the point of adoption. Guildford Council’s proposed position will be that they will not be able to do so and consequently the plan is unlikely to be found sound on this basis without modification.

5.27 In order to ensure the soundness of the plan there is a need to fill a gap in the early years of the plan period with sites where there is certainty that they can and will be delivered. This will ensure diversity of supply and ensure the plan accords with the requirements of paragraph 47 of the NPPF.

5.28 It has been demonstrated that our client’s site could deliver around 70 dwellings of both market and affordable housing within the first five years of the plan period which will contribute to meeting the extensive needs which exist within this area as well as within the Borough as a whole at the start of the plan period.

5.29 Furthermore, paragraph 47 highlights that, ‘Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land…’

5.30 Therefore, given Guildford Council’s persistent and significant under delivery of housing, in order to accord with the NPPF, not only should the plan demonstrate a 5 year housing land supply at the point of adoption, but it should also demonstrate a buffer of 20% in addition to this.

5.31 This further emphasises the critical need for the Plan to demonstrate that there is a supply of sites with certainty that can and will be delivered at the start of the plan period, such as our client’s site at Polesden Lane and Send Marsh Road, Send Marsh.

Reliance on strategic sites

5.32 The reliance of the Local Plan on strategic sites to deliver the required housing during the plan period makes the plan vulnerable particularly given that just six sites are being relied upon to deliver 66% of the overall OAN requirement.

5.33 Each of the six strategic sites are all allocated to deliver in excess of 1,000 new dwellings and will therefore inevitably have considerable lead in times prior to their delivery. This is demonstrated in the LAA housing trajectory with five of these sites not expected to deliver any housing before 2021/2022.
5.34 The Sustainability Appraisal highlights this issue and notes that the Council’s preferred approach results in “an increased reliance on larger sites and hence there would be a likelihood of undersupply within the early part of the plan period.”

5.35 In addition the SA acknowledges that the “high reliance on large (‘strategic’) sites results in a risk that one or more sites will deliver slower than anticipated (or, indeed, not deliver at all in the plan period).”

5.36 This is compounded by the fact that a number of the larger sites allocated within the Local Plan are also reliant on the delivery of significant infrastructure which in turn may also result in additional delays or a lack of housing delivery.

5.37 This is highlighted in the Duty to Cooperate Topic Paper which states in paragraph 4.45 that “…the delivery of former Wisley airfield, Gosden Hill and Blackwell Farm is dependent upon the delivery and timing of key infrastructure requirements on the A3. This is reflected in the expected phasing of the sites, with the majority of provision anticipated post 2027.”

5.38 The current housing trajectory therefore places heavy reliance on the delivery of large strategic sites late within the plan period. This strategy increases the risk that the necessary housing delivery rates will not be met during the plan period leaving the Council unable to demonstrate a five year housing land supply.

5.39 As seen in other Local Authorities, including Wokingham Borough Council, where a similar approach has been taken inevitably lead in times for strategic sites and substantial infrastructure projects are greater than anticipated and delivery is often subject to unforeseen delays.

5.40 The proposed strategy results in three of the strategic sites (Wisley Airfield, Gosden Hill and Blackwell Farm) all having annual housing delivery rates of between 230 – 290 new homes per annum, between 2028 – 2033, which as set out above are all sites which are dependent upon the delivery of critical infrastructure.

5.41 It is also worth noting that the annual housing delivery levels for both Wisley Airfield and Gosden Hill are both greater than the entire annual delivery rates of housing within the Borough in 2013/2014 and 2014/2015 respectively.

5.42 In order for the Local Plan to be found sound at examination this issue must be clarified in order to ensure that the housing delivery proposed across the Borough within the plan period is clearly demonstrated through the supply of sites with certainty that they can and will be delivered, such as our client’s site at Polesden Lane and Send Marsh Road, Send Marsh.

Query over conflicting information

5.43 As set out in the Duty to Cooperate Topic Paper which forms part of the evidence base for the emerging Local Plan “…the total provision of new homes across the plan period (including completions since 2013 and outstanding capacity) within the Proposed Submission Local Plan is 15,844. This provides 1,984 homes as a buffer.”

5.44 It is however noted that Table 1 which accompanies Policy S2: Borough Wide Strategy and sets out the planned delivery of housing between 2018 – 2033 only demonstrates 13,652 homes being delivered between 2018 and 2033.

5.45 This is contrary to the supporting text in paragraph 4.1.12 which states that the table “shows a number of new homes that is greater than the figure in the policy” and does not accord with the housing trajectory set out in the LAA.

5.46 The Council has not justified this approach and without such justification it has not been demonstrated that the plan is consistent with national policy and therefore it has not been demonstrated that the plan is sound.

5.47 We therefore reserve the right to submit further information in regards to the housing strategy of the Borough on the basis that the Council has been unable to provide any clarification in respect of these issues during the six week consultation period.

Soundness of the plan
5.48 In order to ensure that the Local Plan is found sound at Examination we would therefore strongly recommend that the Council revises its housing trajectory to incorporate a greater number of smaller sites which can deliver in the earlier stages of the plan period thereby ensuring that the housing trajectory is robust and achievable.

5.49 This would accord with paragraph 035 of the National Planning Practice Guidance (NPPG) which states that “Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period”.

5.50 As set out in this report Land at Polesden Lane and Send Marsh Road, Send Marsh is a largely unconstrained site in a sustainable location which is available immediately for development.

5.51 We have demonstrated through our Green Belt Assessment and this report that the existing Green Belt designation associated with this land should be removed and as such there are no overriding constraints to prevent early delivery of the site at Polesden Lane.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/2019  Respondent: 15256225 / Boyer (Michelle Thomson)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Plan Making – Tests of Soundness
3.14 The four tests of soundness against which a Local Plan will be examined by an Inspector are set out in paragraph 182 of the NPPF.

3.15 In order to be considered sound, a Local Plan should be;

- ‘Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic properties; and
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.’

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/646  Respondent: 15256449 / S Withers  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the final draft plans relating to Send and Ripley for the following reasons:

1) I object to the increase in the number of homes being planned which has increased from 185 in April 2016 to 485 and this has been done without any consultation under Regulation 18.

2) I object to the removal of Send and Ripley from the Green Belt. Send provides a strategic buffer between Guildford and Woking with lots of areas which are used for location recreation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the 400 houses and the 7,000 sq m of industrial and warehousing at Garlick's Arch. This site was not included in the Regulation 18 draft and has not been subject to consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the 400 houses and the 7,000 sq m of industrial and warehousing at Garlick's Arch. This site was not included in the Regulation 18 draft and has not been subject to consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the new 4-way interchange onto the A3 at Burnt Common which would have disastrous effect on the traffic in Send and Ripley which is already congested and used as a cut through from Woking to the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the new proposal of building of 40 homes and 2 travellers pitches west of Winds Ridge and Send Hill. This is a new proposal and not included in the regulation 18 draft and had not been consulted upon. Development of houses is inappropriate as the road is very narrow with no pavement or lighting. The land to be used for development was previously used for landfill waste which has to be vented. The area is very popular with dog walkers and is an area of beautiful countryside which would be spoiled by any development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I would be interested to know how the building of 1200 new homes can be justified which will change the character of this village beyond recognition? Fundamentally and in my opinion construction on such a large scale will:

- Create more traffic based on the assumption that to every house there are on average 2 car users.
- Have an impact on the local infrastructure putting pressure on the schools and health centre plus shopping facilities.
- Impact on services - I personally haven't seen any plans to support this increase in housing by providing any new shopping facilities or a much needed Post Office.
- Have a cumulative impact by adding traffic to an already busy road network - A31, A331, A323, Gridlock happens in Ash whenever there is a major incident on any of the aforementioned roads.
- Decimate the wildlife and natural appearance of the countryside.

In my opinion, house numbers should be downsized. Ash seems to take the hit every time there is talk of construction with other villages particularly to the east of the borough escaping development on this scale. Why is this?

There are approximately 3000 new homes planned for Aldershot, which neighbours Ash. All these new residents will be using and thus sharing the same road network with the additional residents in Ash. Inevitably, there will be increased road congestion.

Let's also not forget that 400 new homes are planned for land adjoining Ash Lodge Drive and further development in Tongham and this represents large scale development which will greatly affect the character and nature of this village and put pressure on infrastructure.

There must be better assurances of why this housing is needed and if so guarantees that the infrastructure is put in place BEFOREHAND so as not to make everyone's life a misery. It is appreciated that some housing, and suitable housing at that is needed but not on this scale. If I had wanted to live in the middle of a town or city, I would have moved to one.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/974  Respondent: 15256545 / Maaike Zaagsma  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A30

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to see a design plan for this proposed new bridge carrying the A323 across the railway at Ash which will replace the level crossing.

At present I cannot visualise what it will look like and thus what impact it will have on the surrounding area. My concerns are that it will INCREASE traffic through an already busy and sometimes gridlocked village and that more HGVs will enter the village. Furthermore it may also be out of keeping with the area.

Additionally, the area set aside covers land east of Foreman Road. I thought that Persimmon Homes wanted to build houses there so how exactly will that work? Persimmon homes have only recently distributed a pamphlet advising of plans to build 50+ homes on the aforementioned site.

Interestingly, Copperwood Developments who propose 154 dwellings on land to the south of Guildford Road say that land is (quote from their literature) 'reserved to accommodate the Council's future flyover'. I was of the belief that infrastructure HAS to be in place BEFORE new housing construction? The wording suggests that building will go-ahead before infrastructure is in place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPA16/647  Respondent: 15256705 / R.V. Vickers  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/648  Respondent: 15256705 / R.V. Vickers  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

  ° The “objectively assessed need” figure of 693 homes a year is too high.

  ° A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.

  ° The current SHMA inflates the proposed housing figure due to

  ° failure to correct for errors in the historical data for international migration flows,

  ° issues with the way it considers students and affordability and

  ° flaws in the method for estimating the number of homes needed to support job growth.

  ° It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe
inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/965 Respondent: 15256705 / R.V. Vickers Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

1. I OBJECT to Gosden Hill development being in the Local Plan. The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.
There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size. Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
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<tr>
<th>Comment ID: PSLPS16/966</th>
<th>Respondent: 15256705 / R.V. Vickers</th>
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**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

1. **I OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)**

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community...
Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/967  Respondent: 15256705 / R.V. Vickers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/1987</th>
<th>Respondent: 15256705 / R.V. Vickers</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/1984</th>
<th>Respondent: 15256705 / R.V. Vickers</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1985  Respondent: 15256705 / R.V. Vickers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1986  Respondent: 15256705 / R.V. Vickers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/1994  Respondent: 15256705 / R.V. Vickers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/"Disneyfication". Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1991  Respondent: 15256705 / R.V. Vickers  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1992  Respondent: 15256705 / R.V. Vickers  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H3 – Rural Exception Homes

I OBJECT  This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.
The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/1988</th>
<th>Respondent: 15256705 / R.V. Vickers</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

1. I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/1989  **Respondent:** 15256705 / R.V. Vickers  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

1. I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/1990  **Respondent:** 15256705 / R.V. Vickers  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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1. I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1982  Respondent: 15256705 / R.V. Vickers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

1. I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1983  Respondent: 15256705 / R.V. Vickers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:


Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan.

1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/1981</th>
<th>Respondent: 15256705 / R.V. Vickers</th>
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1. I OBJECT to the Borough Wide Strategy (Policy S2)

   a. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

   b. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

   c. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.
These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPA16/650  Respondent: 15256769 / Freda Boyle  Agent:</th>
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<tr>
<td><strong>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</strong></td>
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<td>There is no clear consideration to the infrastructure requirements. The current infrastructure is already at breaking point and becoming inadequate. Further proposed housing levels, roads, doctors and schools will be unable to cope. No adequate consideration has been given for the proposed growth of housing and residents. The A3 and surrounding roads including the A247 which are already at 100% capacity.</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

GBC have failed to provide good evidence in terms of Employment Lands Needs Assessment 2015 (ELNA) which shows an 80% reduction in employment space from the previous ELNA carried out by GBC in 2013.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1019  Respondent: 15256769 / Freda Boyle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have further objections to the large proposed development of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill Policy A25 and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.

I hope that all my objection points listed above will be taken into consideration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/971  Respondent: 15256769 / Freda Boyle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Garlick's Arch Policy A43. Policy A44 1.9ha. Policy 42. I object with the following points on these policies:

1. The building on the Green Belt at Send at Garlick's Arch, Clockbarn Nurseries and Send Hill because it is not justified by any special circumstances and the fact that Green Belt is meant to be permanent and not continually eroded. Garlick's
Arch has a particular conservation sensitivity since it is covered in ancient woodland. Trees which existed in the 18th century would be endangered. The site is also subject to flooding.

2. The development at Garlick's Arch for 400 houses because it was sprung on the village at the last moment with only 2 weeks' notice and without any prior consultation and is not required in terms of housing need either for the village or the borough.

3. The proposed industrial development of 7,000 sq m Garlick's Arch because it is simply not required since the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan. If there is a need for 7,000 sq m of industrial space it should be at Slyfield where there is a 40 ha site available.

4. To building 45 houses at Clockbarn because of inadequate access and traffic volume. Tannery Lane is far too narrow and bendy to take any more traffic. The junction with Send Road is already very hazardous for vehicles emerging into the main road. Planning permission has already been given for 64 houses at the Tannery and the new marina will generate heavy traffic too. The lane and the main A247 road cannot take any more.

5. To the development of 40 houses at Send Hill due to its high quality Green Belt amenity within an area of beautiful countryside which would be spoilt. The subsoil of the existing site contains documented unsafe land fill waste which is currently vented.

6. The proposal to include 2 Travellers Pitches is completely inappropriate due to the narrow width single track country road providing insufficient access to the site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPS16/1018  **Respondent:** 15256769 / Freda Boyle  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A43A. I object to this policy on the following point:

1. The proposed new interchange onto the A3 at Burnt Common because it would be disastrous for Send and the (A247) would be gridlocked all day. I object to the proposed new interchange onto the A3 at Burnt Common because the Transport Evidence is incomplete and unreliable and shows there will be congestion because Send would be used as a cut through to the A3/M25.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I am writing to object to a number of proposals in the revised Guildford Borough Proposed Submission Local Plan. I ask that these objections which are listed below are considered by the Inspector.

I object to all proposals to build on the Green Belt at Send because all the development that is really needed can be accommodated in Guildford's urban brownfield areas and is much closer to existing transport hubs. The whole destruction of the Green Belt in this area is in clear contravention of the central government's stated commitment for Green Belt Protection.

I object to the number of houses that the Plan intends to deliver.

I have further objections which I have listed below:

1. Policy P2. The removal of Send from the Green Belt because the village and its countryside provides a necessary buffer between Woking and Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The complete failure of GBC to identify sufficient brownfield sites within the urban which should be targeted first development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/386   Respondent: 15256769 / Freda Boyle   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

GBC have not followed correct process. Since 2014 GBC has changed every major site in Send proposed for development and just added a massive new road junction. The 2014 proposal for 430 houses went down in April 2016 to 185 and has now gone up again to 485. These significant changes require another full consultation under Regulation 18, not the short cut of Regulation 19 which I believe GBC are trying to do. This invalidates the whole process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/651   Respondent: 15256833 / C J Vickers   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/652   Respondent: 15256833 / C J Vickers   Agent:
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1. I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)
   - The “objectively assessed need” figure of 693 homes a year is too high.
   - A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
   - The current SHMA inflates the proposed housing figure due to
     - failure to correct for errors in the historical data for international migration flows,
     - issues with the way it considers students and affordability and
     - flaws in the method for estimating the number of homes needed to support job growth.
   - It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/968  **Respondent:** 15256833 / C J Vickers  **Agent:**

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<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25</th>
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**Answer (if comment is on questions 1-7 of the questionnaire): ( )**
1. I OBJECT to Gosden Hill development being in the Local Plan. The land in Gosden Hill does exactly what the
Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West
Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors
until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with
paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from
encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All
requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops,
offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back
to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before
the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day
during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow,
winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send
and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two
schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham
which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a
dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it
wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be
uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West
Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around
14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s
requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in
the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for
infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried
out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/969  Respondent: 15256833 / C J Vickers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)
Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/970  Respondent: 15256833 / C J Vickers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2002  Respondent: 15256833 / C J Vickers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1999  Respondent: 15256833 / C J Vickers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2000  Respondent: 15256833 / C J Vickers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2001  Respondent: 15256833 / C J Vickers  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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1. I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2008  Respondent: 15256833 / C J Vickers  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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1. POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents
are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2006  Respondent: 15256833 / C J Vickers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.
Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID:</th>
<th>PSLPP16/2007</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H3 – Rural Exception Homes

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>PSLPP16/2003</th>
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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.
Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

1. I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.  I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/2005</th>
<th>Respondent: 15256833 / C J Vickers</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.  I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/1997</th>
<th>Respondent: 15256833 / C J Vickers</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan.

1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I OBJECT to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

2. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

3. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6695  Respondent: 15257217 / Rebecca Armitage  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. **DRAINS, WATER SUPPLY, FLOOD RISK, CONGESTION**

Our drainage system, our water supply, our medical facilities and our roads cannot cope with the proposed number of new homes West Horsley nor the extra homes on the Wisley airfield site.

To increase the number of houses in West Horsley by 35% will change the character of the village. Building this number of homes will lead to flood risk here and downstream (along the Wey and Thames). The planned development on Green Belt is therefore unsustainable.

East Lane and Manor Farm in West Horsley have been flooded and inpassable several times over the last few years, so further building on Green Belt in the area will result less farmland/woodland areas to for the water to soak away.

1. **LACK OF INFRASTRUCTURE**

The current local amenities of West and East Horsley, car parking, doctors surgery, primary school, station car park are full to bursting and struggle to cope with the existing demand.

The Local Plan makes no reference to providing increased infrastructure to compensate for the extra cars, children and people.

East Lane in particular is a country road with few road markings and gets very congested at school run times, especially where the road narrows to a single lane. Also, there are many children walking, scootering and cycling to school. To increase the number of cars in this area can only endanger children’s lives.

Therefore I ask GBC to revise the housing number, and to amend the Local Plan to utilise brownfield/previously used land rather than green field sites – of which there are significant amounts of the former within the Borough.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/10157  **Respondent:** 15257217 / Rebecca Armitage  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

Our drainage system, our water supply, our medical facilities and our roads cannot cope with the proposed number of new homes West Horsley nor the extra homes on the Wisley airfield site.

To increase the number of houses in West Horsley by 35% will change the character of the village. Building this number of homes will lead to flood risk here and downstream (along the Wey and Thames). The planned development on Green Belt is therefore unsustainable.

East Lane and Manor Farm in West Horsley have been flooded and impassable several times over the last few years, so further building on Green Belt in the area will result less farmland/woodland areas to for the water to soak away.

The current local amenities of West and East Horsley, car parking, doctors surgery, primary school, station car park are full to bursting and struggle to cope with the existing demand.
The Local Plan makes no reference to providing increased infrastructure to compensate for the extra cars, children and people.

East Lane in particular is a country road with few road markings and gets very congested at school run times, especially where the road narrows to a single lane. Also, there are many children walking, scootering and cycling to school. To increase the number of cars in this area can only endanger children’s lives.

Therefore I ask GBC to revise the housing number, and to amend the Local Plan to utilise brownfield/previously used land rather than green field sites – of which there are significant amounts of the former within the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6694  Respondent: 15257217 / Rebecca Armitage  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to register objections to the Draft Local Plan for the following reasons:

1. GREEN BELT

The Green Belt is precious and the purpose of the Green Belt is to stop the unrestricted sprawl of large built up areas and prevent neighbouring towns merging.

By removing East and West Horsley from the Green Belt would change the nature of this area of countryside forever and would eventually merge historic and separate villages.

Furthermore, housing, education needs is NOT an exceptional circumstance in law under The National Planning Policy Framework requirements. Under no circumstances should green belt land be used for housing or educational buildings.

We need to preserve the Green Belt for future generations to enjoy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10155  Respondent: 15257217 / Rebecca Armitage  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
GREEN BELT

The Green Belt is precious and the purpose of the Green Belt is to stop the unrestricted sprawl of large built up areas and prevent neighboring towns merging.

By removing East and West Horsley from the Green Belt would change the nature of this area of countryside forever and would eventually merge historic and separate villages.

Furthermore, housing, education needs is NOT an exceptional circumstance in law under The National Planning Policy Framework requirements. Under no circumstances should green belt land be used for housing or educational buildings.

We need to preserve the Green Belt for future generations to enjoy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
East Horsley - I have no objection in principle to use the Thatcher's Hotel Site for housing provided the density is reduced and that adequate road access provisions are constructed due to the already very busy and dangerous situation that already exists at the junction of the B2039 with the main A246 road with its two dangerous bends at this location.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPA16/2526</th>
<th>Respondent: 15257281 / Kath Frackiewicz</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley South</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

1. I object to the proposal to remove the Horsleys from the Green Belt and for extending the boundaries of the Settlement areas of the Horsleys, thus possibly leading to a substantial number of new homes being built.

2. The public facilities and public transport are already at full capacity. The only practical way to reach East Horsley is by car and parking is already difficult, therefore additional vehicular traffic arising from more people living in the vicinity or coming to East Horsley could not be catered for and would be chaotic for the residents already living there.

3. The infrastructure in East & West Horsley is already over stretched. For instance in East Horsley we have had Thames Water checking the sewers as they have concerns about their capacity. When we have heavy rain we have flooding - refer to government maps which places part of East Horsley on the 'Flood Plain'. The roads around East & West Horsley are already very busy and in many places 2 cars travelling in opposite directions struggle to pass - never mind any larger vehicle. Examples of this can be found on Ockham Road South between Bishopsmead shops and the railway station.

West Horsley - I have no objection in principle to use the Bell & Colville Garage Site for housing.

The remainder of East & West Horsley - As well as the Green Belt issue I mention at the start of my letter, I object to increasing the size of these villages by some 500 additional houses, mainly the proposed additional housing sites in West Horsley. This would destroy the character of both East & West Horsley. In addition to adding the 500 or so houses, such an increase would severely impact East Horsley since West Horsley has no facilities to speak of, i.e. no shops, surgery, bank, library, etc. Therefore more people would travel to East Horsley and further increase the parking problem there. There is a primary school (Raleigh) which is shared with East Horsley but I understand that this is full and certainly the secondary school at Effingham is full. So again any significant increase in people living in East & West Horsley would probably swamp the schools facilities we already have in this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley South</td>
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</tbody>
</table>
In conclusion East & West Horsley as well as Ockham are village communities and I wish them to remain so. Brownfield sites in the Guildford area should be the starting point for any additional housing. Guildford Borough Council being an elected body together with it's Councillors should all be fighting for the wishes of the citizens who have elected them. Whilst I recognise that some additional new housing is required, GBC have a responsibility not to pursue a policy of providing excessive new homes in areas which will encroach into the Green Belt and destroy the wonderful environment of our pretty villages that we live in.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5236  Respondent: 15257281 / Kath Frackiewicz  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of Wisley Airfield and the land surrounding it from the Green Belt and to designate this area as a potential site for building some 2000 new homes. Again this is Green Belt and an open area which should be protected against the developer.

I object to the continued inclusion of Wisley Airfield (Three Farms Meadow) as a potential site for new housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5237  Respondent: 15257281 / Kath Frackiewicz  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Wisley Airfield - I strongly object to any form of building here as I mention above. This is an area of Green Belt land with no infrastructure and non-existent transport facilities other than road access. The reasons for unsuitability and rejection of this area for potential development are well documented in the recent rejection by GBC Planning of a planning application for access to this site. The Wisley site must be removed from the Local Plan. Access from this site to the A3 is very poor and already the junction is at capacity at peak travel periods. Rail transport is already at full capacity and the car parks at nearby stations are fully utilised. The large increase of vehicular traffic and people from houses built at Wisley could not be absorbed by the current infrastructure and public facilities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10472  Respondent: 15257281 / Kath Frackiewicz  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The land held by Surrey University should be released to permit student accommodation to be built upon it. If students were accommodated in this way then the housing that they currently occupy in the Guildford area would become free and allow other people to live there or allow development of new houses. Again this must be implemented before any Green Belt land is developed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10470  Respondent: 15257281 / Kath Frackiewicz  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the overall proposal to remove the villages listed in the above document from the Green Belt, in particular East Horsley, West Horsley, Ockham & Ripley. This is fundamentally against the principles that our countryside is protected from building on and to ensure that there is a balance between houses and open spaces. The Green Belt we have in the Guildford area and particularly around East Horsley, West Horsley, Ockham and Ripley preserves/protects the environment, air quality, helps to prevent flooding and provides open countryside for all to share and enjoy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/10473  Respondent: 15257281 / Kath Frackiewicz  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Settlement Boundary in Local Plan 2003 being re-drawn in the 2016 Local Plan. The lines as designated in 2003 should remain.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10471  Respondent: 15257281 / Kath Frackiewicz  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A part of any local plan should be to use up all brownfield sites first, whether immediately available or at a later date, before any other land for housing is considered. There are areas in the Guildford area where there are unoccupied pieces of land, derelict offices and industrial areas. Areas which need re-generation must be identified and used for housing needs before any other land is considered. Developers must be made to use brownfield land and not just proceed with what they see as a 'cheaper' option, i.e. the development of green fields.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10477  Respondent: 15257281 / Kath Frackiewicz  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. The recent proposal for new housing at the Effingham School site was recently rejected by GBC. Surely if this site was rejected then the conditions for building more homes in the Horsleys & Ockham are even less justifiable.

2. Onslow Estate Housing - Why has this proposed area not been listed for new housing? I understand from the local press that GBC do not wish to take up the offer for this large site to have new houses. This site has good access to the A246 and is close to Merrow shops and public transport including the park & ride which provides excellent access to the centre of Guildford.

3. In order to achieve a better balance in the housing stock GBC should implement a strict policy to ensure that the demolition of small houses including bungalows and the resulting construction of replacement houses of a much larger size be immediately stopped. Whilst current policy appears to favour the developer, the removal of smaller housing stock reduces the number of properties to which people can downsize to and obviously if there are no such smaller houses available in the area that people wish to continue to live in they will just remain in their larger homes and not free up existing houses for growing families.

4. It would appear that many of the comments and views raised by local people in the previous consultation appear to have been largely ignored, certainly as far as the Horsleys, Ockham & Ripley villages are concerned.

5. The objective of adding some 14,000 new homes, which I understand represents a net increase of some 25% to the housing stock of Guildford Borough over the next 20 years, appears grossly overstated given the nationally projected population increase of 15% over the same period. I have to question whether employment in the area; infrastructure including roads and public transport; facilities such as hospital, medical and schooling; will increase by a similar amount. If not then it surely is illogical to start to plan for so many additional houses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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| Comment ID: | pslp171/1628 | Respondent: | 15257281 / Kath Frackiewicz | Agent: |
|-------------|--------------|-------------|-----------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2017 / Policy P2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? | ( ) |
| is Sound? | ( ) |
| is Legally Compliant? | ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): | () |

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Green Belt Policy: The proposed plans and changes to the insetting of East & West Horsley as well as the movement of the settlement boundaries of the respective villages is unacceptable and against the policy of having a protected Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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| Comment ID: | pslp171/1627 | Respondent: | 15257281 / Kath Frackiewicz | Agent: |
|-------------|--------------|-------------|-----------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2017 / Policy S2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? | ( ) |
| is Sound? | ( ) |
| is Legally Compliant? | ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): | () |
Borough Wide Strategy: I object to the statement where it states "the figures set out in the Annual Housing Target table sum to a total of 12,426" yet the numbers in the table only add up to 9,810. What is the significance of the missing 2,616? I also object to the inclusion of a 10% contingency in the housing number over the plan period. This is unnecessary and misleading in putting forward housing requirements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attended documents:

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Comment ID: PSLPP16/2028  Respondent: 15257665 / Colin Leyden  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? (Yes), is Sound? (Yes), is Legally Compliant? (Yes)

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to congratulate the Council on this plan which I found to be extremely thorough and well thought through. I am particularly interested in the plans for Affordable Housing. I write to state that I am in complete agreement with the Council's proposed plans. I have lived in the Guildford area for over 10 years. I have a young family living in a one-bedroom accommodation and cannot afford to buy a property with the additional bedroom that I need for my young daughter. I very much hope that the Council's proposed plans to increase the number of affordable homes is adopted.

The Council's plans have my full support.

Colin Leyden
13th July 2016

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attended documents:

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Comment ID: PSLPA16/2957  Respondent: 15257697 / Deborah allen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the proposed removal of Send from the green belt area and to all proposals to build on green belt at Send and elsewhere in the borough when there are adequate brownfield areas to accommodate what is really needed.

I object to a new interchange with the A3 at Burnt Common, this would cause more problems to an already very busy section whereby at peak times will become gridlocked. This would be disastrous for Send and the A247. The noise and pollution levels are already harsh for those living in the area. Send would be taking traffic from the proposed new houses at Wisley, Gosden Hill, Burpham and Blackwell Farm with a lot of this traffic coming through the village to and from the A3 and M25.

I object to the building of 400 houses and 7000 sq metres of industrial space at Garlicks Arch. This proposal only recently became known to the residents of Send without any prior consultation.

The infrastructure requirements have not been properly considered and are inadequate to deal with the proposed housing levels. Our roads, doctors and schools will be unable to cope. Industrial space is not needed and if it was could be accommodated on the Slyfield industrial estate as was originally proposed and would not impact anything else that wasn’t already affected.

I object to the building of another 45 houses at Clockbarn Nursery as Tannery Lane. These roads cannot take anymore traffic and the junction with Send Road is already dangerous as it is quite a blind spot and will be made much worse. Already planning permission has been given for 64 apartments and a marina which is going to generate additional traffic.

I object to the development of 40 houses and 2 travellers pitches at Send Hill there is insufficient access and it would spoil a high amenity area in beautiful countryside. The cemetery has been extended on Send Hill and this will make for more traffic in any event. This area needs to remain as a peaceful area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: SQLP16/387</th>
<th>Respondent: 15257697 / Deborah allen</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): (No)</td>
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<td>The evidence for additional housing in this area has not been proven: the gathering of numbers was mostly due to the expansion of Guildford University and that is not the normal birth and death situation so I do not believe the numbers accurately reflect</td>
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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to Send village being removed from the surrounding green belt potentially removing the buffer between Guildford and Woking towns.
- I object to 40 houses and two travellers pitches squished into a small area of beautiful grass and woodland alongside the narrowest part of the lane further away from the village amenities.
- I object to 45 dwellings on clockbarn nursery in another narrow country lane
- I object to a new interchange with the A3 at Burnt Common adding considerable traffic passing through Send and Ripley village roads.
- I object to considerable development at Garlick’s arch adding considerable pressure on all services schools and further congestion in a rural area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to policy A 42 to increase the number of houses on the Clock Barn Nursery site from 45 to 60 ,again with a narrow lane and open views from the River Wey Navigation along with further loss of Green Belt and possible increase in surface water flooding issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to policy A 43

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to policy A43 to further increase the Garlicks Arch massive development which would join Send and Ripley with no effective Green Belt divide and create huge traffic increases on the Old Portsmouth Road and surrounding local roads/lanes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy A58 on the grounds of taking more Green Belt to build warehouse and industrial units when there seems to be plenty of empty units in more appropriate sites elsewhere in Guildford and surrounding areas in .This would again add more inappropriate traffic to the village and elsewhere locally.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy 2 to inset Send Business Park from the Green Belt because this is a beautiful area close to the River Wey with very narrow access along Tannery Lane and this would be entirely inappropriate for the surroundings.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The current infrastructure cannot support the proposed development.

The Ash Vale Health Centre has no spare capacity, the existing roads are already congested at peak times, the trains are already busy at peak times, the recent development in Tongham has only just completed and the proposed increase of over 1200 houses in this area will put an impossible strain on schools, in particular infant, junior and Primary schools.

There are no local facilities for young people in Ash and the surrounding area. There are only a few park areas and the sports centre attached to the Ash Manor school is insufficient to support such a swell in population. Library opening hours are limited.

Whilst Ash Vale has a community centre and a small parade of shops, there are few designated parking facilities, which inevitably leads to on street parking which in turn causes traffic build up. There is very little parking at both Ash and Ash Vale stations, which will lead again to more parking problems.

The transport links, especially the number of buses and routes, are very limited in this area and this will inevitably lead to more cars, congestion and pollution.

In this area, there is only a small Post Office counter housed within the One Stop in Ash, this has on occasion run out of stamps. There is no Post Office in Ash Vale and to my knowledge, no plans for one.

The vastness of these proposal is detrimental to the green and open nature of this area. Ash Green will sprawl into Ash and result in a swollen population of a small village, which already has few facilities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am responding to the proposal A46 for the doubling in size of the village of Normandy which I believe to be unsound.

If as part of a well researched plan there is believed to be a need for a new village/town to be created this needs to be clearly stated and a case made for it and the location chosen. This has not happened in this case. On the basis of a desire by a commercial company to make money a devise (the provision of a secondary school) has been suggest to get around the green belt legislation. If you take a walk over the proposed site you will seeing beautiful Surrey countryside, agriculturally productive and support large amounts of wildlife. If you go there of a spring evening you may here the nightingale that has returned to the same coppice for so many years. For the sake of a need to comply with a bureaucratic planning requirement you will be doing completely unnecessary harm. By all means continue to add 10 or 20 houses a year to the village (and others) as has happened over the last number of years. Organic growth can be absorbed, dumping large ill thought out and under resourced developments without massive new infrastructure (which seems not to have been considered) cannot.

Please reject this proposal. Do not destroy our village and our lives for the next twenty years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPA16/657</th>
<th>Respondent:</th>
<th>15258401 / Lynda Pullen</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

Re: proposed developments in Send and a new interchange onto the A3

I object to the removal of Send from the Green Belt because the village and its countryside provides a necessary buffer between Woking and Guildford and I particularly to the building on the Green Belt at Send at Garlick's Arch, Clockbam Nurseries and Send Hill because it is not justified by any special circumstances. In act that area of Green Belt is meant to be pennant and not continually eroded.

I object to the exaggerated "housing need" figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need. I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford's urban brownfield areas much closer to existing transport hubs.

I object most strongly to the proposed new interchange onto the A3 at Burnt Common because the Transport Evidence is incomplete and unreliable and shows there will be congestion because Send would be used as a cut through to the A3/M25. This would be disastrous for Send and the A247 would be gridlocked all day; just please visit this area during any of the rush hours to understand the significant weight of traffic that already uses the A247 and the minor surrounding roads. The knock on effect up to the small roundabout at Old Woking (where the B382 joins it) will be a really serious problem.
In fact I object to all the proposed sites in Send because, not least because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially. We were promised there would be no major changes made to the 2016 draft plan by the Leader of the Council.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/1022</th>
<th>Respondent: 15258401 / Lynda Pullen</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the large proposed development of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/1020</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the development at Garlick's Arch for 400 houses, which was sprung on the village at the last moment with only 2 weeks' notice and without any prior consultation. This has been quite disgraceful. Also this proposed development is simply not required in terms of housing need either for the village or the borough.

I object to the proposed industrial development of 7,000 sq m at Garlick's Arch because it is simply not required since the latest Employment Land Needs.

Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan. If there is a need for 7,000 sq m of industrial space it should be at Slyfield where there is a 40ha site available.

I object to the development at Garlick's Arch because the site has particular conservation sensitivity since it is covered in
ancient woodland. Trees which have existed since the 16th century would be endangered. The site is attractive open countryside and part of the permanent Green Belt, with is protected under the National Policy Framework. It also represents an unrestricted sprawl and goes against the purposes of the Green Belt which include the prevention of merging towns and settlements. Oh yes, and the site is also subject to flooding!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<table>
<thead>
<tr>
<th>Comment ID: PSLP16/1021</th>
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<tr>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the development of 40 houses at Send Hill due to its high quality Green Belt amenity within an area of beautiful countryside which would be spoilt. The subsoil of the existing site contains documented unsafe land fill waste which is currently vented. The proposal to include 2 Travellers Pitches is completely inappropriate due to the narrow width single track country road providing insufficient access to the site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/2029</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that infrastructure requirement have not been properly considered and are inadequate to deal with proposed housing levels. Roads, doctors and schools will be unable to cope. The local school cannot take any more pupils. The local doctors' surgery cannot take any patients.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID: PSLPP16/2030</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I vehemently object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are already at 100% capacity.

I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

I ask that you please take note of the deep concerns of a huge number of Send residents and indeed many others who are connected to the village, pass through it on a daily and use this area for recreational purposes.

Please would you acknowledge receipt of this letter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1024  Respondent: 15258721 / Anya Lam  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:
- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt increase tail backs on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/332  Respondent: 15258721 / Anya Lam  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1025  Respondent: 15258753 / Christine Gregory  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1026  Respondent: 15258785 / Iris Murdock  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1027  Respondent: 15258881 / G Worsdell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1028  Respondent: 15258913 / J New  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
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- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1029  Respondent: 15259009 / David Hart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:
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- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1031  Respondent: 15259137 / Britta Stent  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1034  Respondent: 15259329 / David Hartley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1035  Respondent: 15259361 / L Leung  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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- add to Guildford’s pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1036  Respondent: 15259425 / R Fiandel  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1037  Respondent: 15259489 / David Martin  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/277  Respondent: 15259649 / Christine M. Weddle  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1038  Respondent: 15259649 / Christine M. Weddle  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1043  Respondent: 15259873 / Sarah Fiander  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1045  Respondent: 15259969 / Stephen A Mills  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1048  
Respondent: 15260353 / I Arnold  
Agent:  

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1049  
Respondent: 15260417 / Maeve Susan Slowcroft  
Agent:  

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/658  Respondent: 15260737 / P Hayman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the proposed removal of Horsley from the Green Belt. it is our fields and Green areas that give us a lovely environment in which to live, that adds to our quality of life, not densely developed area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2034  Respondent: 15260737 / P Hayman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Our local schools are full to capacity as it is, our dentists, doctors and of course the R.S.C.H is breaking under the strain. Our local amenities will not be able to cope with the large increase of population and traffic.

If the proposed increase of houses goes ahead we all loose the quality of life that so far the village of Horsley give us.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/2033  Respondent: 15260737 / P Hayman  Agent:
**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have lived for over 40 years at this address, the traffic just continues to increase, as does flooding from surface water. When it rains, due to areas surrounding me, ditches have been infilled and my back gardens flood. How can the existing water network cope with the addition of so many more houses?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPA16/659  **Respondent:** 15260865 / K M Pearmain  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to the density of housing proposed for Send as there is not the infrastructure to support such development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPS16/1052  **Respondent:** 15260865 / K M Pearmain  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A44 would involve building on land fill waste which is currently vented and unsafe.

I object to this.
Policy P2 proposed building on land close to the River Wey Navigation and liable to flooding. It also would improve taking Send out of the Green Belt. There is no need to do this as there are alternatives more suited to the existing road infrastructure.

I object to this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2035  Respondent: 15260865 / K M Pearmain  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There are sufficient brownfield sites to provide the necessary key worker housing so [text unreadable].

I wish to point out that the new development plans require full consultation under Regulation 18. At the moment all plans are invalidated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2036  Respondent: 15261473 / Alan Bryant  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Ref: Proposed Planning For East Horsley Etc,

I am writing to place on record my objections to the above proposals as detailed below:-

1. TRAFFIC AND PARKING

The level of traffic on Ockham Road South/North is already excessive, particularly with heavy vehicles who use it as a short cut to the A3 and the M25. Parking in the centre of the village (ie Station Parade) is already at full capacity and there is no space for building further shops.

2. SCHOOLS AND MEDICAL FACILITIES
These are both under full strain and would be unable to stand up to a large influx of houses (over 500 and 2,068 on Wisley airfield)

3. GENERAL COMMENT

In common with all others in this village we strongly object to the loss of Green Belt status. We came East Horsley in 1971 as shopkeepers and would be against any plans which would change the character of one of Surrey's best villages. Surely there must be other Green Belt areas in Surrey which would be more suited to the plans proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1057  Respondent: 15262209 / J H Brown  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Normandy Flexford Development Objection

This is a flood plain area with overflow from Worplesdon Pirbright.

School, 1,100 houses, traveller site - I don't think so.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1059  Respondent: 15262273 / Michael Mead  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Having lived in Woodlands for 32 years, traffic has increased to such an extent that during peak periods residents of Woodlands joining the A 247 can regularly take up to 10 minutes due to a solid line of traffic coming from Woking to join the A3 in a southerly direction.

I OBJECT to the following:-
Policy (A43)
The A247 cannot be widened to take more traffic.

Air quality and noise level for householders along the A247 must also be considered

Our local Send Surgery cannot accommodate more patients.

Our local schools are also filled to capacity.

In 2014 the council rejected a planning application from Old lands to build 25 houses on very sound planning grounds, so now, how is an application to build 400 houses and 7,000 sq metres of industrial buildings even being considered?

Residents in Send, Ripley and West Clandon purchased their properties in villages because all are surrounded by Green Belt.

As ratepayers of Guildford Borough Council, they cannot have this Green Belt destroyed and should be more protected in line with the current government policy by their Council.

Policy 43a

The New North and South slip-roads to and from A3 to the A2.47 Glandon Road) would generate considerably more traffic, pollution and noise through the A2.47 Glandon road, Send Village leading to Old Woking, along both roads which are already at capacity without any widening possibility.

We all understand the need to build new houses, within the borough but all brown field sites should first be used.

I would also favour limited development on the old Wisley airfield providing connecting Country lanes are protected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8245  Respondent: 15262273 / Michael Mead  Agent:  

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3068  Respondent: 15262273 / Michael Mead  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have previously objected to the proposed development of 400 houses on this Green Belt prime Agricultural land and historic woods. The new policy A43 now adds eight travelling/showpeople pitches to this development rendering the Policy even more inapporiate for the majority of G Rated properties within a 2 mile radius of this area.

The Borough council is reminded that in past 2/3 years it refused planning application for Oldlands to build 25 houses in the same location. The Council therefore cannot still incorporate this Policy within the Plan and still maintain that it applies Consistant Practice in their Planning Policy. This proposal would increase the local population so considerably and destroy totally the villages of Send and Ripley which in reality is not something that Ratepayers, in West Clandon, Send, and Ripley together with outlying areas would be prepared to accept. There is certainly no genuine reason to destroy Green Belt and Ancient Woodland which it contains, when Brown field sites within GBC areas could be used.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/666  Respondent: 15262305 / L J Crane  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have concerns over the strain the additional proposals will place on local resources. The roads in the surrounding area will not be able to cope with the addition of some 800 vehicles of local traffic. It is also my belief that the current local surgery will be overstretched with the addition of houses proposed causing a backlash for current residents.

I OBJECT to the removal of 15 villages, including Ripley and Send, from the green belt. This will lead to wholesale, and often inappropriate developments.
I OBJECT to the fact that GBC have not followed the correct process for Send and Ripley developments. Any significant
changes to the 2014 proposals, such as the proposal development of Garlicks Arch, should have required another full consultation, which did not happen. This invalidates the whole process.

I OBJECT to the fact that GBC have failed to provide sound evidence in terms of the Employment Land Needs Assessment which shows that industrial space at Burnt Common IS NO LONGER NEEDED.

I OBJECT to Policy A43.30 the proposed development of Garlicks Arch designated for 400 houses and an industrial estate. This is a new site not included in the Regulation 18 draft and has NOT been consulted on previously. It is not only permanently protected green belt but also a site of ancient woodland with some trees planted in the 16th century.

I OBJECT to policy A43.30 the development of new four way interchange onto the A3 which would mean that narrow Send Road (A247) would be the main route for traffic leaving the M25 and A3. It is already crowded and vulnerable to traffic jams. Further traffic from this development would result in permanent gridlock. It simply would not work.

I OBJECT to policy A44 which would see 40 homes and two travellers' pitches on land west of Winds Ridge and Send Hill. This was again a NEW site NOT included in 18 draft and therefore has NOT been consulted on previously. Once again this is Green Belt land partly containing unsafe landfill. Access is by a narrow lane which could never take the volume of traffic that would ensue from traveller's pitches.

I OBJECT to the fact that the Local Plan takes no account of schools, doctors surgeries and roads that are already operating at full capacity. Another 4000 houses in this area with a conservative estimate of a further 8000 cars would be catastrophic.

I OBJECT to the proposal in the local plan on the grounds that Send Hill is a single track country road and too narrow to provide sufficient access to the site or accommodate the potential new levels of traffic the proposed development would bring.

I OBJECT to the proposal in the local plan on the grounds that the proposed number of houses potentially could result in 92 extra cars in Send Hill which is already suffering from congestion particularly at school run time.

I OBJECT to the proposal in the local plan on the grounds that a wasteland solutions environmental report on Send Hill dated March 2004 gave evidence of past ponding of water in the excavated area. Further development would disturb water table and increase risk of flooding to my property.

I OBJECT to the proposal in the local plan on the grounds that the proposed development site (A44) was used as GBC registered landfill site, not a quarry as listed as reference LLA 2081 in the local plan.

I OBJECT to the proposal in the local plan on the grounds that the 1963-8 Ordnance Survey maps of the proposed site mark it as “refuse and slag heap”. It is therefore unsuitable for such a development on health reasons.

I OBJECT to the proposal in the local plan on the grounds that the Traveller Accommodation Assessment research, purported to have been undertaken in June-July 2012 by Mill Field Services, cannot be the case. The Sittingbourne based market research company was dissolved in January 2011 according to the government companies site.

I OBJECT to the proposal in the local plan on the grounds that both Envirossearch report RS1100201_1_1 dated 17th February 2004 concludes “potentially contaminative industrial sites identified from analysis” of Ordnance survey maps.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to Policy A43.30 the proposed development of Garlicks Arch designated for 400 houses and an industrial estate. This is a new site not included in the Regulation 18 draft and has NOT been consulted on previously. It is not only permanently protected green belt but also a site of ancient woodland with some trees planted in the 16th century.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4514  Respondent: 15262305 / L J Crane  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy A43.30 the development of new four way interchange onto the A3 which would mean that narrow Send road (A247) would be the main route for traffic leaving the M25 and A3. It is already crowded and vulnerable to traffic jams. Further traffic from this development would result in permanent gridlock. It simply would not work.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4517  Respondent: 15262305 / L J Crane  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy A44 which would see 40 homes and two travellers' pitches on land west of Winds Ridge and Send Hill. This was again a new site not included in 18 draft and therefore has not been consulted on previously. Once again this is Green Belt land partly containing unsafe landfill. Access is by a narrow lane which could never take the volume of traffic that would ensue from traveller's pitches.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4521  Respondent: 15262305 / L J Crane  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposal in the local plan on the grounds that Send Hill is a single track country road and too narrow to provide sufficient access to the site or accommodate the potential new levels of traffic the proposed development would bring.

I OBJECT to the proposal in the local plan on the grounds that the proposed number of houses potentially could result in 92 extra cars in Send Hill which is already suffering from congestion particularly at school run time.

I OBJECT to the proposal in the local plan on the grounds that a wasteland solutions environmental report on Send Hill dated March 2004 gave evidence of past ponding of water in the excavated area. Further development would disturb water table and increase risk of flooding to my property.

I OBJECT to the proposal in the local plan on the grounds that the proposed development site (A44) was used as OBC registered landfill site, not a quarry as listed as reference LLA 2081 in the local plan.

I OBJECT to the proposal in the local plan on the grounds that the proposed development site mark it as "refuse and slag heap". It is therefore unsuitable for such a development on health reasons.

I OBJECT to the proposal in the local plan on the grounds that the Traveller Accommodation Assessment research purported to have been undertaken in June-July 2012 by Mill Field Services, cannot be the case. The Sittingbourne based market research company was dissolved in January 2011 according to the government companies site.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/9779  Respondent:  15262305 / L J Crane  Agent:  

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have concerns over the strain these unlawful development proposals will place on the current infrastructure. for example secondary schooling is already a massive issue in the surrounding are and in the whole oversubscribed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/9796  Respondent:  15262305 / L J Crane  Agent:  

Page 651 of 2804
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that the Local Plan takes no account of schools, doctors surgeries and roads that are already operating at full capacity. Another 4000 houses in this area with a conservative estimate of a further 8000 cars would be catastrophic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9785  Respondent: 15262305 / L J Crane  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of 15 villages, including Ripley and Send, from the green belt. This will lead to wholesale, and often inappropriate developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9789  Respondent: 15262305 / L J Crane  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the fact that GBC have not followed the correct process for Send and Ripley developments. Any significant changes to the 2014 proposals, such as the proposal development of Garlick's Arch, should have required another full consultation, which did not happen. This invalidates the whole process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1877  Respondent: 15262305 / L J Crane  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A42 change at Clockbarn nursery in Tannery Lane because it will increase access and traffic problems in Tannery Lane and at the A247 juncton. It will deplete the green belt which is in contradiction to the reason the green belt was put in place in the first place and will impact open countryside views from the River Wey Navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1875  Respondent: 15262305 / L J Crane  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A58 at Burnt Common because The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt. The impact on small surrounding roads will create traffic gridlock.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1060  Respondent: 15262369 / Matthew O'Hare  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM)?

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I often visit my in-laws who live in Ockham, who are an integral part of our family. The traffic around the M25/A3 Junction, and indeed the local traffic level in Ockham, is already dangerous due to the volume. If there were to be more cars, as I understand it around 4000, then that junction will become dangerously overcrowded. The local lanes are just not equipped to take the inevitable increase in traffic, especially in view of the many cyclists who use the area.

I object to the inclusion of the site formerly known as Wisley Airfield in the local plan as a possible site for the building of a large number of houses. The planning committee have unanimously refused planning permission for houses to be built on that site so there is no reason to include it in the Local Plan. It cannot be built as there is no permission for it.

I object to the inclusion of the site formerly known as Wisley Airfield in the local plan as a possible site for the building of a large number of houses as it undermines the concept of localism and community cohesion and assent.

I especially object to the detrimental impact on transport, local roads and road safety. I specifically object to the proposition that the development will result in a meaningful detriment to the community’s ability to safely cycle or walk. The development is dislocated from public transport hubs and the residents will be entirely reliant on their cars to travel, as there are no transport links of any kind except narrow roads and the enormously busy M25/A3 junction, which could not stand an influx of thousands of extra cars.

Because the Olympic Cycle race and the Prudential Ride London-Surrey cycle race come through Ripley and past Ockham and Horsley, cyclists are encouraged to cycle throughout this area. The number of cyclists on these narrow roads has increased dramatically especially on Saturday mornings, coincidentally the favoured shopping time for most people. I object to the addition of any extra cars that will be an undeniable danger to these cyclists; discouraging cycling in direct contravention of the governmental aspirations to encourage it both as a sport and mode of transport.

Wisley Gardens has proposed an expansion which will increase visitor traffic to a level that will already increase more than it stands today and so I object to any proposal that will increase the traffic any further and put an already over populated road junction under even greater strain making long stationary queues a probable permanent feature of this junction.

I object to the detrimental effect the development would have on the character of the area. Houses in Ockham are old, vernacular, set back from the road, built in hollows or behind trees, are a maximum of two stories, with perhaps an attic conversion, and very sparsely arranged in terms of number of houses per hectare; it is part of our local culture and heritage. This development is scheduled to be built on the crest of a hill, is urban in nature, and has a population density equal to or greater than the most congested parts of London. It will include units up to five stories high; twice the height of anything in the area. I strongly object to the detrimental effect the proposed development will have on the environment and the various sites of special significance that border it.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPS16/1127  **Respondent:** 15262785 / Jonathan Henderson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A28

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

**OBJECTION**

As the current occupiers of Ash Green Station, we feel well based to be able to comment on the rather strange boundaries you have created for Ash Green in the plan. You are proposing that Ash Green Road be included in the Ash and Tongham urban area. Where will the boundary be on A28 as you are proposing development of this site? There will be no boundary between Ash and Ash Green. Ash Green actually starts North of Ash Green Road. We believe the greenbelt boundary should be placed north of Ash Green Road as a minimum.

The amount of proposed development in A28 will detrimentally change the character of the village. Large housing developments are not in keeping with Ash Green and the surrounding area and the density of the development is vastly too high. Ash Green is only suitable for accommodating small scale infill housing. Extending the village by over 20% cannot be classed as small scale infill. Rural Ash Green is not a Strategic Area for Growth, this development threatens turning the area from rural to urban.

As the current owners and guardians of the locally listed, historic building of Ash Green Station, we feel that the historic context would be lost as we would be surrounded by and right in the middle of proposed new housing developments, not in keeping with the village.

According to the NPPF guidelines Ash Green is not a suitable location for sustainable development because it has no shops, doctors, community facilities and it's public transport infrastructure is very poor. Guildford Borough Council's own Settlement Hierarchy ranks this as the least sustainable location in the borough.

Local schools, doctors and dentists are already under pressure. We currently struggle to get a doctors appointment within two weeks.

We believe the proposed level of development is fundamentally flawed as there is a huge lack of infrastructure - a practically non existent bus service, no real means to safely get to Ash station (there is little option other than to use a car, either to get to the station or elsewhere), and already major congestion on local roads. Ash Green does not have a suitable transport network - we are not set up to take more residents and therefore more traffic. There are already huge delays and traffic jams locally with the main route through Ash in effect being closed 35 minutes out of every hour at the level crossing causing pinch points. We have eight of the top hotspots for traffic congestion within Surrey in and around Ash. The Hogs Back to Guildford at peak times is extremely congested and would struggle with any increase in volume.

Are Guildford Borough Council in correspondence/consultation with Hampshire County Council regarding the new building developments in Aldershot and the surrounding areas? We share bus, rail and road services (with one of the major routes out of Aldershot meeting the A323 at Ash), these new developments will put a strain on everything before Guildford Borough Council even start with any of their proposed developments.

Ash Green, Ash and Tongham has a long recorded history of flooding issues and the sewerage system is at full capacity. With the proposed level of development this will do nothing other than exacerbate an already major problem. Our house already suffers the effects from poor water drainage as the railway cutting is used for local surface water drainage. We have serious concerns that major development on this site could lead to further issues regarding flooding.

We believe site A28 is not suitable for development as our house which is as stated earlier on the local list of buildings which are of intrinsic historic interest would be impacted massively by any development on this site. The old station is built into the railway cutting, and as such we only have windows on the south side of the building at ground level, which is level...
with the old track bed. Any development of A28 would result in loss of light to our property and also mean we would be completely overlooked by properties on this site, we would lose all privacy. We would also have greatly increased noise and disturbance from all the residents and road noise, both within the estate and on White Lane. Where would the proposed entry and egress points be for this site? White Lane would be awkward and dangerous as it has a blind crest on the bridge to the north and a slight curve in the road to the south. Drovers Way is not designed to take this level of traffic. The junction of White Lane, Ash Green Road and Foreman Road has a history of accidents and a development on A28 would potentially add to this problem with increased traffic levels.

We feel it would be an incredible tragedy to lose such a wonderful greenfield site, which once developed, we would never get back, for us, or future generations. Under the proposed developments Ash Green would lose it's rural identity and historic boundaries. We need to protect these areas and instead redevelop urban areas and brownfield sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>15262785 / Jonathan Henderson</th>
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OBJECTION

As the current occupiers of Ash Green Station, we feel well based to be able to comment on the rather strange boundaries you have created for Ash Green in the plan. You are proposing that Ash Green Road be included in the Ash and Tongham urban area. Where will the boundary be as you are proposing development on site A28? There will be no boundary between Ash and Ash Green. Ash Green actually starts North of Ash Green Road. This is where we believe the greenbelt boundary should be placed.

The amount of proposed development will detrimentally change the character of the village and change it from countryside to urban. The NPPF sites that no development should do this. Large housing developments are not in keeping with the surrounding areas and the density is vastly too high. As the current guardians of the locally listed, historic building of Ash Green Station, we feel that the historic context would be lost as we would be surrounded by and right in the middle of new housing developments, not in keeping with the village. We would end up being the buffer proposed in A29!

We believe this proposed level of development is fundamentally flawed as there is a huge lack of infrastructure - a practically non existent bus service, no real means to safely get to Ash station (there is little option other than to use a car, either to get to the station or elsewhere), and already major congestion on local roads. Ash Green does not have a suitable transport network - we are not set up to take more residents and therefore more traffic. There are already huge delays and traffic jams locally with the main route through Ash in effect being closed 35 minutes out of every hour at the level crossing causing pinch points. We have 8 of the top hotspots for traffic congestion within Surrey in and around Ash. In the plan you suggest changes to road layouts to combat some of these issues, however it would just cause traffic to then travel through Ash Green, creating congestion throughout the entire area as well as on the main road A323. The area cannot take 1200 new homes and the thousands of extra vehicles that would inevitably come with them. The Hogs Back to Guildford at peak times is extremely congested and would again struggle with any increase in volume.

Are Guildford Borough Council in correspondence/consultation with Hampshire County Council regarding the new building developments in Aldershot and the surrounding areas? We share bus, rail and road services (with one of the major
routes out of Aldershot meeting the A323 at Ash), these new developments will put a strain on everything before Guildford Borough Council even start with any of their proposed developments.

Local schools, doctors and dentists are already under pressure. We currently struggle to get a doctors appointment within two weeks.

Ash Green, Ash and Tongham has a recorded history of flooding issues, with the proposed levels of development this will do nothing other than exacerbate an already major problem.

We feel it would be an incredible tragedy to lose so much of the greenbelt, which once developed, we would more than likely never get back, for us, or future generations. Under the proposed developments Ash Green would lose its rural identity and historic boundaries. We need to protect these areas and instead redevelop urban areas and brownfield sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2732  Respondent: 15262785 / Jonathan Henderson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A28

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECTION TO SITES A28 & A29 AND THE PROPOSED CHANGE TO ASH GREEN BOUNDARIES

I believe the title of Policy A28 needs to be corrected to say “Ash Green” not “Ash”. Policy A28: Land to the east of White Lane, Ash GREEN, states it requires

“(2) Sensitive design at site boundaries that has regard to the transition from urban to rural
(3) No unacceptable impact on trees and ancient woodland
(4) Recognition of the historic location of Ash Green village”.

However I believe the Local Plan (Policy A28) will impact on trees and ancient woodland within the site and does not recognise the historic location of Ash Green village. I have outlined evidence to support my beliefs below.

As the current occupier of Ash Green Station, I feel well based to be able to comment on the rather strange boundaries Guildford Borough Council has created for Ash Green in the 2017 plan. GBC are proposing that the houses of Ash Green Road along with the land south of this up to and including site A28 be included in the Ash and Tongham Urban Area (ATUA), which is historically Ash Green. There will be no boundary between Ash and Ash Green. Ash Green starts on land North of Ash Green Road (part of the proposed A29 development), a fact which seems to have been ignored by placing A28 into the proposed ATUA. I believe the countryside boundary should be placed along Ash Green Road as a minimum but ideally allowing for a buffer into the field south of Ash Manor but north of Ash Green Road, with A28 left as countryside, not shoe-horned in as part of the proposed plans.

The more appropriate, natural defensible boundaries would be either along the old railway line or preferably, along Ash Green Road, which would retain Ash Green village and station in its historic location.

The Ordinance survey map as shown in GBC own Greenbelt and Countryside Study names Ash Green both to the north of the old railway line as well as the south. (see below)

[Map]
As can be seen on this historic O/S map, circa 1920 there were no buildings mapped in Ash Green to the south of Ash Green Lane East, the only properties in Ash Green were those to the north of the railway cutting. Buildings specifically named are Ash Green Station and Ash Green Farm, with the ancient woodland of College Copse running from the railway cutting to Ash Green Lane (east).

[Map]

Ash Green Ash Green (modern estate) (to the south of Ash Green Lane East) was not the original Ash Green, but had started to appear by mid 20th century, as this map shows circa 1944. The entrance to Dene Lodge through the ancient woodland marked as College Copse has been mapped, showing that the whole of site A28 was originally covered by College Copse. A portion of the remainder in A28 is now classed as ancient woodland, therefore we believe any trees north of the ancient woodland on A28, especially on the western boundary of A28 adjoining White Lane up to the railway cutting be treated with a high degree of sensitivity as they are growing on land which once formed College Copse.

[Map]

In addition to the above maps in relation to the boundaries of Ash Green village, this image from 1977 shows signage indicating Ash Green is to the north of the railway cutting as well as to the south.

[Image]

I would also like to bring to attention that the bus stop north of the railway line outside the old station on White Lane is referred to as “Ash Green, Old Station”.

[Image]

I wholly agree with your statement in the local plan (below)

Section 3 Spatial Vision, which states:
“Further development is also proposed in and around Ash and Tongham on land beyond the Green Belt along with new green belt designated to prevent Ash and Tongham merging with the village of Ash Green.”

I wish to see historic Ash Green comprising Ash Green Road and Ash Green Station included as part of the area of separation.

I feel the locally listed building of Ash Green Station under the proposed plans would lose its historic context of actually being in Ash Green. It is a ‘Heritage asset’ as defined by the NPPF; “A building, monument, site, place, area or landscape identified as having a degree of significance meriting considerations in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing)”. The NPPF also states “Significance derives not only from a heritage asset’s physical presence, but also from its setting”. I believe Guildford Borough Council needs to give more consideration to Ash Green Station and its historical setting.

As stated in Policy D3 below: Historic Environment.

“1) We will conserve and enhance the historic environment will be conserved and enhanced in a manner appropriate to its significance. We will support development of the highest design quality that will sustain and conserve, and, where appropriate, enhance the special interest, character and significance of the borough’s heritage assets and their settings and make a positive contribution to local character and distinctiveness will be supported.

2) Heritage assets are an irreplaceable resource and works which would cause harm to the significance of a heritage asset, whether designated or non-designated, or its setting, will not be permitted without a clear justification to show that the public benefits of the proposal considerably outweigh any harm to the significance or special interest of the heritage asset in question. “

The proposal to remove historic Ash Green from Ash Green goes against the NPPF policy contained within the Local Plan (as shown below), which GBC says it will adhere to.
4.5.43 We will ensure that new development must conserve heritage assets in a manner appropriate to their significance. The NPPF defines significance as “The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic.” The contribution of the setting of heritage assets to the appreciation of these qualities will be carefully considered alongside more direct impacts of development proposals.

The proposed changes would remove Ash Green Station (locally listed) and Ash Green Road out of Ash Green, as well as the historic housing of the Ash Green area.

By developing A28 there is also potential to lose the aforementioned ancient woodland within A28 as well as detracting the original setting of The Old Station.

A29 also goes against this policy and NPPF guidelines by placing Grade II Listed Ash Manor and associated buildings in the centre of a modern housing estate.

Policy D4: Character and design of a new development states that
1) High quality design is expected in the borough. All developments will:
(l) conserves locally and nationally important heritage assets and conserves or enhances their settings
(m) has no unacceptable effect on the amenities enjoyed by the occupants of buildings in terms of privacy, noise, vibration, pollution, dust, smell and access to sunlight and daylight.

By moving Ash Green village boundary (l) would not be complied with. A28 would also have an impact on Dene Lodge (locally listed building) and A29 (south of Ash Green Road) would impact on the setting of Woodberry (also locally listed). Development of A29 around Ash Manor would impact the historic settings of Ashe Grange, Ash Manor, Old Manor Cottage, The Oast House, Stable and The Barn to the south of Ash Manor, all Grade II listed properties.

In reference to (m), development of A28 has the potential to block sunlight, reduce privacy and increase noise at our property, due to the unusual fact it is built into a railway cutting and as a result it is below the ground level of A28. Station house ground floor only has windows on the southern side of the house (as the northern side is built into the bank), therefore the horizon for our southern aspect on this floor has a much lower effective horizon and as a result the sun only just reaches our windows in winter months. If development occurs on the northern boundary of A28 it could well result in the complete blocking of natural light to the property on the ground floor. Station House suffers from an unusual phenomenon in that sound reverberates and travels along the old railway cutting. We often hear the noise of trains on the current line in our house, even though it is some distance away. We have concerns that noise from A28, A29 and A31 will carry along the cutting in the same way.

As can be clearly seen on the map below, sites A28 and A29 to the south of Ash Green Road really don’t make any sense in terms of preserving historic Ash Green and should be removed from the plan. The buffer zone to separate Ash from Ash Green should be placed on the land to the north of Ash Green Road up to and around Ash Manor to compliment and preserve its well documented historic setting.

With the proposed southern extension of A28 it will potentially require the felling of trees and the destruction of the ancient woodland of College Copse up to the driveway of Dene Lodge. If A28 and the area of A29 south east of Ash Green Road are removed from the Local Plan it will provide obvious continuity to the natural defensible boundary for the countryside (the ancient woodland which bounds the eastern edge of A29 should be included in this) thereby preventing the urban sprawl of Ash and merging of Ash Green into the ATUA.

I also object to some of the current and proposed wording in the plan.

I believe Policy P3: Countryside, 4.3.29 should be amended to “Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before
further development”. This is because I think infrastructure is greatly lacking, especially in relation to roads, traffic and public transport.

I believe 4.3.30 should be amended to “We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green”. I think it is vital this sentence be included in the plan as there is a real danger with the current proposed sites of A28 and A29 losing Ash Green’s historical location and identity.

I believe Policy P3: Countryside (1) (c ) should be amended to “does not lead to greater physical or visual coalescence between Ash Green, the Ash and Tongham urban area and Aldershot”, in order to protect Ash Green as a separate village.

I believe Policy A29: Land to the south and east of Ash and Tongham, Requirements (6) needs to be amended to protect Ash Green village and the houses within it. As I have pointed out and evidenced with maps, Ash Green Station and the houses along Ash Green Road formed the village of Ash Green before the more modern buildings south of the railway cutting appeared, and therefore it is indefensible that GBC want to remove the buildings that originally formed Ash Green village from Ash Green.

I believe the wording needs to be “Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road/White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development should not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the build up area and the countryside beyond”.

The wording in Policy A29, Requirements (8) does not offer enough protection to the Grade II listed buildings of Ash Manor and their surroundings, and therefore should be more specific and say “Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Approaches and views to, from and around this heritage asset must be protected.”

In Policy A29, I believe Requirements (9) of a new road and footbridge should be in place before any development of A29 commences and the wording should reflect this. Also requirement (9) does not address the other significant transport infrastructure improvements that are required to cope with the huge increase in traffic created by Policy A29.

According to the NPPF guidelines Ash Green is not a suitable location for sustainable development because it has no shops, doctors, community facilities and its public transport infrastructure is very poor. Guildford Borough Council's own Settlement Hierarchy ranks this as the least sustainable location in the borough. Site A28 lies within Ash Green and therefore should be removed from the Local Plan.

Local schools, doctors and dentists are already under pressure. I currently struggle to get a doctors appointment within two weeks.

I believe the proposed level of development is fundamentally flawed as there is a huge lack of infrastructure - a practically non existent bus service, no real means to safely get to Ash station (there is little option other than to use a car, either to get to the station or elsewhere), and already major congestion on local roads. Ash Green does not have a suitable transport network - we are not set up to take more residents and therefore more traffic. There are already huge delays and traffic jams locally. We have eight of the top hotspots for traffic congestion within Surrey in and around Ash. The Hogs Back at peak times is extremely congested and would struggle with any increase in volume.

Are Guildford Borough Council in correspondence/consultation with Hampshire County Council regarding the new building developments in Aldershot and the surrounding areas? We share bus, rail and road services (with one of the major routes out of Aldershot meeting the A323 at Ash), these new developments in Hampshire will put a strain on everything before Guildford Borough Council start with any of their proposed developments.
Ash Green, Ash and Tongham has a long recorded history of flooding issues. With the proposed level of development this will do nothing other than exacerbate an already major problem. Our house currently suffers the effects from poor water drainage as the railway cutting is used for local surface water drainage. I have serious concerns that major development around us could lead to further issues regarding flooding.

Where would the proposed entry and egress points be for site A28? White Lane would be awkward and dangerous as it has a blind crest on the bridge to the north and a slight curve in the road to the south. Drovers Way is not designed to take this level of traffic. The junction of White Lane, Ash Green Road and Foreman Road has a history of accidents and a development on A28 would potentially add to this problem with increased traffic levels. I feel it would be an incredible tragedy to lose such a wonderful greenfield site, which once developed, we would never get back, for us, or future generations. Under the proposed developments Ash Green would lose its rural identity and historic boundaries. We need to protect these areas.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents: [Henderson Objection.pdf](Henderson Objection.pdf) (1.6 MB)

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### Comment ID: PSLPA16/674  Respondent: 15263073 / James Walker  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

Answer (if comment is on questions 1-7 of the questionnaire): ()

17.1 OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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### Comment ID: PSLPA16/675  Respondent: 15263073 / James Walker  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

Answer (if comment is on questions 1-7 of the questionnaire): ()
18.I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to failure to correct for errors in the historical data for international migration flows,
- issues with the way it considers students and affordability and
- flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/1064  **Respondent:** 15263073 / James Walker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

1. I OBJECT to Gosden Hill developement being in the Local Plan. The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.
Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
15.1 OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brownfield site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> ()</td>
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<tr>
<td>16.1 <strong>OBJECT</strong> to the inclusion of the land for new on/off ramps at Burnt Common (A43a)</td>
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<td>The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic. The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved. This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.</td>
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8.1 OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)  
I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.  
The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.  

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

5.1 OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**
6.1 OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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7.1 OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1. **POLICY E6 - The leisure and visitor experience**

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains Travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
Student accommodation should provide for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2070  Respondent: 15263073 / James Walker  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H3 – Rural Exception Homes

I OBJECT. This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2066  Respondent: 15263073 / James Walker  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
9.I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

10.I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
11. OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

12. OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3.1 OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2060  Respondent: 15263073 / James Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4.1 OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the
flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2057  Respondent: 15263073 / James Walker  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan.

1. OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2058  Respondent: 15263073 / James Walker  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2.1 OBJECT to the Borough Wide Strategy (Policy S2)

a. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

b. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

c. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”.

Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4626   Respondent: 15263073 / James Walker   Agent:  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity.
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4627  Respondent: 15263073 / James Walker  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.

6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.

7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.
18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented."
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.
9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.
10. The impact on small surrounding roads will create traffic gridlock.
11. It will join up existing villages and defeat the purpose of the Green Belt.
12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.
13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.
14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3064  Respondent: 15263073 / James Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp17q/606  **Respondent:** 15263073 / James Walker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPA16/717  **Respondent:** 15263297 / Wendy Taylor  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()
PLEASE SHOW TO THE PLANNING INSPECTOR

I object strongly to GBC’s proposal to desimate the countryside surrounding Send Village by removing it from the Green Belt. I cannot believe that as a clear election promise to preserve and protect the Green Belt you now propose to renege on that promise. It would appear you have no special circumstance to justify abandoning the National Planning Policy Framework which was intended as permanent and you now propose to ride roughshod through Ancient Woodland.

I object strongly to the suggestion that GBC are in fact taking the building responsibilities intended for Woking BC I find that a particularly sinister practice.

I object strongly to the fact that you, GBC have changed every major site in Send proposed for development since 2014 and now you have just added a huge new road junction. As you have made significant changes to your original and amended proposals, your current changes now require another full consultation not the short cut of regulation 19 which GBC are now trying slide this proposal through on.

I object to the fact that GBC have refused to disclose the calculations regarding Guildfords housing requirement, the proposal to build 400 houses on Garlicks Arch (a site that floods, and ancient woodland) and 7000sq meters of industrial space is clearly ridiculous and it has been suggested the beginning of GBC to merge Guildford to Woking. Once you remove the Green belt from our Villages you know the developers will desimate our homes, needlessly. you have perfectly adequate accommodation for the proposed industrial space available at Slyfield Industrial Estate inconveniencing no homeowners.

I object to the fact that your proposed building on Clockbarn Nursery and Send Hill are currently served by narrow and twisty lanes. Tannery Lane (Clockbarn Nursery) cannot take anymore traffic the junction is already dangerous. Likewise, Send Hill is inappropriate not only because of the single access country road providing insufficient access but also because the subsoil of the proposed site contains documented unsafe landfill waste which is registered at GBC.

I object to the new interchange with the A3 at Burnt Common as an already busy road, often gridlocked during rush hours, would have to take the traffic from the proposed new GBC building at Wisley, Burpham and Blackwell Farm we simply cannot support it and the noise and pollution levels would be unmanageable and possibly dangerous.

Our infrastructure is already stretched, you have alternative available sites and I find your trudging through the Green Belt and your sinister handling of this planning proposal, unacceptable. I object to the fact that Guildford and Surrey County Council own brownfield sites which would accommodate your plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/513  Respondent: 15263297 / Wendy Taylor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send Marsh/Burnt Common

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Yet again I find I must write to you regarding your proposal to remove Send and Ripley from the Green Belt. I am so disheartened that you appear to disregard the perfectly valid plea of the local residents and that the infrastructure of our locality is already stretched and many of your plans seem unnecessary, vicious and petty.

I object to the fact that I find my breathing laboured as a direct response to the already heavy weight of traffic which crawls past my house in gridlock, not just domestic traffic but the increase HGV is remarkable in the last few years, and my house now shakes as some of these vehicles pass my house belching pollution into the air we breath, and you feel happy to increase the threat to our health in this way, may I remind you we have a primary school on the road you wish to increase the traffic on, I object to the fact that although there seems plenty of small building projects locally, (indeed I understand there is permission for six more properties on my neighbours garden recently agreed),this is happening all over Send and Ripley, but still not enough to satisfy GBC who really don't care that it is so difficult to get a doctors appointment in our surgery, that we are already subject to local flooding.

I object to the fact that you have a total disregard for the beauty and peace of Ancient Woodland that benefits us all but you wish to heartlessly bulldoze through the heart of British countryside.

I object that you have brownfield sites unused and available but you still feel it necessary to scar our land with more empty warehouses.

I cannot believe that you now plan to increase by over 30% the number of houses you want built in Tannery Lane.

I object to the fact that you need our votes and money but you do not listen, you are prepared to increase the toxicity in this area, you are apparently happy to destroy ancient natural beauty and you make no sense, you are a lazy council, unprepared to listen, to use sites already available, and you still expect unquestioning support. I am completely disheartened, sad, that you have so little heart and fight.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/2253  **Respondent:** 15263425 / Rosemary Napp  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Strongly support the importance of good design, having regard to heritage and effects on views, natural features etc. As expressed in paragraph 4.5.8, especially as applied to Guildford urban area

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/2254  **Respondent:** 15263425 / Rosemary Napp  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It is essential that layout, scale, form, height and materials, as described is a primary consideration in all applications. In Guildford town no buildings should be developed that exceed 4 stories, except in circumstances where it can be clearly demonstrated that the critical views and surrounding environment will not be compromised, and then 5 stories should be the absolute limit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2255  Respondent: 15263425 / Rosemary Napp  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The projection for retail space is far too high, preference should be given to residential housing. The comparison to Woking and Kingston is interesting, we specifically do not want our Town to resemble either of these. Development of the riverside area is supported.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2249  Respondent: 15263425 / Rosemary Napp  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It is essential that the University of Surrey be required to provide accommodation for students on campus. I would like to see this percentage increased so that the demand for housing in the town is decreased allowing more houses to be available for general rent and sale. Provision of on campus housing should be scheduled for the early years of the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<td>The policy of at least 40% affordable homes is strongly supported. I oppose government policy that this percentage need not be applied to less than 10 homes developments.</td>
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<td>Policy strongly supported, essential that affordable homes are available for local people, and the requirement for these homes to be occupied by local people must be preserved in perpetuity</td>
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This policy is supported

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I oppose the development of the Blackwell Farm site, there cannot be a good solution to the problem of additional pressure on traffic using this part of the road network.

The housing proposals in Guildford Town Centre must only be approved if there is a limit to height of building, no more than 4 stories, that there is no interference with the unique views that give Guildford Town its character. High quality materials should be specified that blend with the natural environment. There should be no increase in the number of houses allocated for the Town Centre, whatever is decided for other sites. Green spaces in the Town need to be preserved.

It should be accepted that provision of the level of housing required will mean some incursion of the Green Belt.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/475  Respondent: 15263425 / Rosemary Napp  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

the assessment of housing need expressed in the SHMA produced by GL Hearn, is flawed, making no allowance for the transient population of higher education students, and by a number of other issues. It is essential that these issues are addressed and rectified with numbers reducing from circa 700 per year to circa 500 per year.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1070  Respondent: 15263873 / Paul van den Bosch  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object very strongly to the proposed development which makes no realistic assessment of the impact it will have on a valuable section of greenbelt both for the existing community and a large group who use it as a recreational resource.

In particular I am gravely concerned about the effect on local roads which are already under great pressure and will not cope with the significant additional burden

I appreciate that GBC will encounter objections wherever development is proposed and probably views it as less difficult to try and manage a small number of larger developments than many small ones. However, for this proposed site, the extent and nature of the change is far beyond that which any community could reasonably be expected to accept.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/1074  Respondent: 15263873 / Paul van den Bosch  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A47

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to this proposed development as it will greatly increase the volume of traffic on roads which are rural and often used for recreation. The siting of this development will lead to large numbers of vehicles in West Flexford Lane and Flexford Road. The planning document mentions access to the station which is of course important but no household in this area will be without a car and the unpavemented roads on which children may walk to buses and the station will be significant less safe as well as the large number of ramblers who use these routes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/678  Respondent: 15263905 / Philip Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

17.1 I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/679  Respondent: 15263905 / Philip Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
18. I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to failure to correct for errors in the historical data for international migration flows,
- issues with the way it considers students and affordability and
- flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1071  Respondent: 15263905 / Philip Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to Gosden Hill development being in the Local Plan The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from...
encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

15.1 OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

16.1 OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2083  Respondent: 15263905 / Philip Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

8.1 OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2080  Respondent: 15263905 / Philip Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
5.1 OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2081  Respondent: 15263905 / Philip Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

6.1 OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2082  Respondent: 15263905 / Philip Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

7.1 OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2089  Respondent: 15263905 / Philip Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains Travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.
4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2087  Respondent: 15263905 / Philip Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

 Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2088  Respondent: 15263905 / Philip Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H3 – Rural Exception Homes

I OBJECT. This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2084  Respondent: 15263905 / Philip Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

9.1 OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and
with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

10.1 OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2085  Respondent: 15263905 / Philip Walker  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

11.1 OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 &
M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2086  Respondent: 15263905 / Philip Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

12.1 OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2078  Respondent: 15263905 / Philip Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3.1 OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and
the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2079  Respondent: 15263905 / Philip Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4.1 OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2076  Respondent: 15263905 / Philip Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan.

1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

   The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

   The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

   The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

   The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

   What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2077  Respondent: 15263905 / Philip Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2. I OBJECT to the Borough Wide Strategy (Policy S2)

   a. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

   b. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

   c. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study.
On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID:</th>
<th>pslp172/4601</th>
<th>Respondent:</th>
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<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A25</td>
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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at
this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.

6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.

7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).

8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4602  Respondent: 15263905 / Philip Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.
23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4604  Respondent: 15263905 / Philip Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3047  Respondent: 15263905 / Philip Walker  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/600  Respondent: 15263905 / Philip Walker  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9908  Respondent: 15263937 / Jim Holloway  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

An expansion of this size would seriously damage the character of the town and spoil the surrounding countryside. Guildford Council should choose to constrain it's overall housing growth and it's unacceptable that this is not put in place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9907  Respondent: 15263937 / Jim Holloway  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
My biggest concerns are extra traffic congestion especially in central Guildford and with that would come horrendous parking issues. Guildford town centre is already lacking in adequate parking sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9909  Respondent: 15263937 / Jim Holloway  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Brownfield sites centrally should be developed to produce more accommodation for students on campus and homes for the elderly thus freeing up family homes in the surrounding areas that could come back onto the market to ease the housing shortage.

I strongly believe this expansion plan is wholly inappropriate to the structure, size and layout of Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/680  Respondent: 15264001 / Robert Peake  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

17.1 OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/681  Respondent: 15264001 / Robert Peake  Agent:
18.1 OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to failure to correct for errors in the historical data for international migration flows,
- issues with the way it considers students and affordability and
- flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I OBJECT to Gosden Hill development being in the Local Plan. The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1077  Respondent: 15264001 / Robert Peake  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

15.1 OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)
Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1078  Respondent: 15264001 / Robert Peake  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

16.I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2097  Respondent: 15264001 / Robert Peake  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

8.I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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5.1 OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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6.1 OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/2096  **Respondent:** 15264001 / Robert Peake  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):**

7.1 OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/2103  **Respondent:** 15264001 / Robert Peake  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):**

1. POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that
order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains Travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2102  Respondent: 15264001 / Robert Peake  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H3 – Rural Exception Homes

I OBJECT. This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2098  Respondent: 15264001 / Robert Peake  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

9.I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.
Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

10. I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
11.1 OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2100  Respondent: 15264001 / Robert Peake  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

12.1 OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2092  Respondent: 15264001 / Robert Peake  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
3.1 OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2093   Respondent: 15264001 / Robert Peake    Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4.1 OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan.

1.1 OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
2.1 OBJECT to the Borough Wide Strategy (Policy S2)

a. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

b. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

c. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>pslp172/4607</th>
<th>Respondent:</th>
<th>15264001 / Robert Peake</th>
<th>Agent:</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4608  Respondent: 15264001 / Robert Peake  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.

4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”

5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.

6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.

7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.
11. It will join up existing villages and defeat the purpose of the Green Belt.
12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.
13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.
14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3050  Respondent: 15264001 / Robert Peake  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/602  Respondent: 15264001 / Robert Peake  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3389  Respondent: 15264065 / Roshan Bailey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to this proposed development. It is in an exceptionally beautiful area of Green Belt land and is entirely inappropriate for development. There has already been significant encroachment by sequential development over the years and there has to come a time when a line is drawn. The remaining ancient woodland appears to be excluded from the proposed development, but this woodland and its important wildlife would inevitably be adversely affected by being enclosed by new and existing development. The traffic issues in the area are already severe, and these should be addressed before consideration is given to increasing the load on the A31 and A3. I know from personal observation and work in collecting evidence for a Rights of Way application, that all the fields included in the proposed site are currently used extensively by walkers (with and without dogs), cyclists and horse riders living in the Wood Street, Onslow Village, Fairlands, Normandy and Wanborough areas, and these fields are therefore a really important part of the amenity of the area. Many of the people I have spoken to also visit the Ranges, part of the Thames Basin Special Protection Area, and they would undoubtedly frequent the latter more if these fields are taken from us. I hope that development on this site will not proceed, but please see my comments above re an addition to the infrastructure requirements under Policy I1 and Appendix C in the event that our objections do not prevail.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3388  Respondent: 15264065 / Roshan Bailey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of any parts of Normandy and Flexford, and of the fields around Blackwell Farm, from Countryside as shown on the maps within the draft Local Plan. My comments on Sites A46 and A26 refer to these areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3390  Respondent: 15264065 / Roshan Bailey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object vehemently to the proposed development on this site which seems to me to be the most extraordinarily inappropriate and ill conceived of all the proposals in the draft Local Plan. This is Green Belt land, previously identified as a “red” site of high sensitivity, and the change appears to be predicated purely on the basis of a developer having come forward with a plan, money, and arguments unsupported by evidence.

The sheer scale of the proposal is audacious and totally impractical. Quite apart from the fact that it would destroy the character of our quiet, rural village, and destroy our very special countryside and wild life, the infrastructure is simply incapable of supporting any significant development, let alone something of this scale.

There is clear evidence that there is absolutely no need for an additional secondary school in the area. The neighbouring secondary schools are currently under-subscribed, King’s College by as much as 57%. The New Guildford University Technical College will open in 2018, and both King’s College and Ash Manor have scope to increase their capacity if they reach 100% of their current capacities. Christ’s College also has space, capacity and willingness to expand its intake, and other schools in Ash and Woking can also offer places to Guildford residents. There are thus many ways of meeting Guildford’s needs without going to the expense of building a new school at all, but even if there was a need, this is an entirely inappropriate site. Ignoring the circularity of the suggestion, even if the development went ahead, it would only generate a need for one form per year which could easily be accommodated within existing local schools. I hope that these arguments alone will be sufficient to ensure rejection of this proposed development. However, I would also draw attention to the impact on traffic, flooding and the Thames Basin Special Protection Area:

- **Traffic:** Our roads already take very heavy traffic during the morning and evening rush hours and grind to a halt when accidents on the A31 or A3 prompt motorists to detour via the A323 and Westwood Lane and Glaziers Lane, the rural lanes on either side of the proposed site (each with pinch points at the railway crossings). As things are, it is not unusual for a morning journey from Normandy to Guildford to take over an hour. The impact of the proposal to close off access to Guildford via Farnham Road can only exacerbate matters, as will developments already planned in Aldershot. Adding 1100 new homes plus a school of up to 8 forms per year would simply turn the whole area into a huge permanent gridlock with traffic fumes killing any wildlife that had survived the development. The increase in traffic would not only affect Normandy but the whole of the surrounding area, from Guildford to Aldershot, including Ash, Wood Street Village and Park Barn.

- **Flooding:** Normandy has an extremely high water table and regularly experiences serious problems with flooding. The stream running across Westwood Lane, Glaziers Lane, Elmgrove Lane and under the A323 at Tickners Bridge frequently bursts its banks in a number of places. My house has been completely flooded internally on a number of occasions and we have personally spent a lot of money over the years improving our flood resilience as well as benefitting from supportive measures taken by GBC. However, we are very dependent on the capacity of Normandy’s fields and trees to absorb surface water during the growing months and of the fields to provide water storage space in the winter. Building over the fields will take away this capacity and overload the stream, with consequent flooding at vulnerable points such as the restricted bridges at Glaziers Lane and Elmgrove Lane. Such flooding is highly likely to flood houses internally and to block road traffic. Recent improvements to protect the Beech Lane residents from perpetual flooding have been designed on the basis of current arrangements ie with the fields between Westwood Lane and Glaziers Lane as a buffer, so the downstream risk will be further heightened if this development goes ahead.

The additional housing is also being suggested as a solution to the apparent problem that Normandy and Flexford have lost shops and pubs “due to insufficient populations to support them”. For many years in the past, with smaller populations, our village did sustain shops and pubs. Their demise is far more likely to result from changed behaviour and different needs: cars, internet, smoking bans, etc have significantly altered the way people shop and socialise nowadays. If you ask the people of Normandy whether the provision of a few shops and pubs is worth the destruction of our countryside, wildlife and the character of our village, the answer would undoubtedly be a resounding “no”.

The name of Normandy is believed to derive from “no man’s land”, reflecting the openness of our area. Normandy is, and should remain, a vital “green lung” separating the potential urban spread from Guildford and Aldershot. Allowing 1100 new houses, a huge school, and other buildings to replace open countryside would strangle the whole area. The proposed site is within a stone’s throw of the Thames Basin Special Protection Area. Normandy, Pirbright and Ash residents are close enough to access the firing areas before and after shooting finishes and many of us do use the whole area regularly. This is such a special and lovely place to walk, ride and cycle, that it is inconceivable that, irrespective of any SANG
For all these reasons, this extraordinary and wholly inappropriate proposal should be rejected and taken out of the proposed Local Plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/7480  **Respondent:** 15264065 / Roshan Bailey  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the order of stages inherent in this policy. It is clear that the borough has significant highway problems at present without any additional development, but the measures to address these are not yet clear and would anyway take many years. Some of the proposed developments would clearly have a huge impact on transport pressures, but detailed assessments would not be undertaken until planning applications are submitted. It nevertheless appears that the infrastructure plans are being used to justify taking rural areas out of the Green Belt for developments which could well prove to be unsustainable. This is unacceptable: sustainability should be proven first, with an appropriate timetable.

FRR5: Please see my comments on Policy P4.

SED3: I object to the proposal for a secondary school near Wanborough Station. Please see my comments objecting to Site A46.

Additional: Due to the volume and speed of traffic on the A31, there is already a need to provide safe crossings where footpaths and bridle ways theoretically connect the north and south slopes. The communities of Normandy, Wanborough, Puttenham, Seale, Compton and Wood Street Village used to be well connected, but the north / south links are now almost unusable. If site A26 does go ahead, we will lose a huge amount of countryside on which many of us walk, cycle and ride every day. The developers should be required to provide significant funding for safe access to the southern slopes of the Hogs Back to partially mitigate our loss, with some local government and highways funding also being made available to make our rights of way viable again and to reconnect communities rent asunder by traffic.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/7476  **Respondent:** 15264065 / Roshan Bailey  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the wording of this policy as it does not provide sufficient protection for our very special countryside. The wording of the policy should be strengthened to provide much clearer protection both for Areas of Outstanding Natural Beauty and for Areas of Great Landscape Value.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7477  Respondent: 15264065 / Roshan Bailey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I absolutely object to the principle of insetting or removal of any of our rural villages from the Green Belt. I object because they are really are of an open character and do make an important contribution to the openness of the Green Belt. In particular, I object to the insetting or removal of Normandy from the Green Belt. Normandy’s name was derived from “no man’s land”, reflecting its character as a collection of rural settlements with significant open land within, between and beyond them. Furthermore, Normandy is renowned for its very special wildlife which is an important part of the Green Belt. It is thus an absolutely crucial part of the “green lung” for maintaining the separation between urban growth. Elsewhere in the draft Local Plan eg Policy P3, the need to avoid the merging of Ash, Tongham and Ash Vale is recognised. It is just as important to ensure that the open character of Normandy’s settlements is maintained, and this can only be done by retaining Normandy fully within the Green Belt.

I also strongly object to the removal of Blackwell Farm and its surrounding fields from the Green Belt. There has to be a limit to step by step encroachment of urban sprawl, and it is entirely inappropriate to downgrade this exceptionally beautiful area which is still actively farmed today and clearly contributing to the openness of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7478  Respondent: 15264065 / Roshan Bailey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I believe this policy should be strengthened to require more explicitly that all development proposals should demonstrate how they will manage severe weather events and the impact of surface water on other properties, roads and footpaths. They need to be able to show that they have investigated and understood how local water flows change at such times. It is also important to ensure that the knock on effects of improvements in surface water management are considered eg there has recently been significant improvement work in the Beech Lane area of Normandy. This will put potentially put added stress on downstream areas which would have to be taken into account for any development in the area designated as A46 to ensure that the risks around Glaziers Lane and Elmgrove Lane are not increased during storms or persistent heavy rainfall.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7479  Respondent: 15264065 / Roshan Bailey  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to this policy as it stands since I believe it needs significant strengthening to ensure the appropriate level of protection for the Thames Basin Special Protection Area. It is important to ensure that measures required of developers will make a real difference in that the new residents will really use the designated alternatives. This means that the density of housing must be limited, truly significant green spaces must be an inherent part of larger developments, and alternative provision for smaller developments must be close by with easy access for new residents. I object to the principle that developers may simply make a payment to Guildford Borough Council against a list of SANG sites which the new residents will not actually use as an alternative to the TBSPA. It is a cop out for developers, albeit a potential money making scheme for GBC, and will not achieve the protection ostensibly sought. Please also see my comments on Policy I1 re an addition to Appendix C. I walk for 1 to 2.5 hours almost every day, half the time towards the slopes of the Hogs Back and half the time on the Ranges (TBSPA). If site A26 goes ahead and the mitigation I suggest does not take place, I will undoubtedly walk on the Ranges even more often, and other walkers and riders would respond similarly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7474  Respondent: 15264065 / Roshan Bailey  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
While I accept the principle of a presumption in favour of sustainable development, I think it is important to stress the sustainability aspect. In particular, I think this policy should be enhanced with some words to reflect the importance of the Green Belt within our Borough. Please also see my comments on Policy P2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the numbers set out in this policy. There appear to be serious flaws in the methodology used in the SHMA and the conclusions derived from it are consequently unacceptable. Particular issues of concern are that inconsistent jobs and employment data have been used for the economic assessment of housing need; there is no assessment of the likely impact of Brexit; and the economically derived housing number is taken as the OAN without consideration of the potential for sustainable commuting or the implications of the Green Belt land area within the borough. There is also significant circularity in the arguments. For instance, a significant proportion of the projected economic growth arises from the construction work to build dwellings for the workers needed in economic growth. So you only need the workers if and while you build the houses. This is not sustainable economic growth and cannot justify building the houses. Similarly, schools are said to be needed to serve the new homes. The answer to this circularity is not to build the houses.

I also object to the approach by which huge developments are proposed for just a few sites in extremely sensitive areas. A more organic approach with more but smaller developments spread across the borough to meet only the real needs of our communities would be much fairer and more sustainable. There is a perversity in proposing to destroy the character of our villages and thus reducing their attraction. If the Economic Strategy is not realistically achievable without destroying the character of our borough and its villages, then that strategy should be reviewed. Economic growth at all costs is not a desirable objective.

Given my recognition of the need for some development and for all of us to share the burden, I am not commenting in detail on all the sites in my neighbourhood, only on A26 and A46 (see below). However, I would make the general comment that there must be no “thin end of the wedge”, no continuing encroachment once a small site has been approved, and there should be consistency in application of the policies.

I also object to the lack of any policy reference to retrospective applications. I suggest that specific words should be included in the policies, probably this one, to make it clear that developing first and asking later will not be tolerated. Indeed, there should be a presumption that retrospective permission will not be granted and that enforcement action will be taken except where there is a really exceptional and acceptable explanation for the failure to seek approval first.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I still object to the proposals for site A26 Blackwell Farm as a whole despite the small reduction in house numbers. This site should never be developed. It is an integral part of the beauty and special landscape around the Hogs Back. There has already been too much encroachment onto this area, and any further development should take place within the parts already built up. There is plenty of scope for the University to make greater use of the land already occupied eg building above and below car parks etc. The land is actively farmed and is also extremely well used by local families and individuals for walking, running, cycling, horse riding, bird watching, observing flora and fauna, etc, and elimination of this lovely open space will send more people to the Thames Basin Special Protection Area. The infrastructure changes that would be required for a development of this scale, in particular the roads and junctions, would add further destruction to the AONB, AGLV and Green Belt. I also specifically object to the new proposal for a huge secondary school on this site. The evidence collected and submitted last summer showed that there is absolutely no need for an additional secondary school in the area. The neighbouring secondary schools are currently under-subscribed, King’s College by as much as 57%. The New Guildford University Technical College will open in 2018, and both King’s College and Ash Manor have scope to increase their capacity if they reach 100% of their current capacities. Christ’s College also has space, capacity and willingness to expand its intake, and other schools in Ash and Woking can also offer places to Guildford residents. There are thus many ways of meeting Guildford’s needs without going to the expense of building a new school at all.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2628  Respondent: 15264065 / Roshan Bailey  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wholeheartedly support the removal of the proposals for Site A46 from the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2629  Respondent: 15264065 / Roshan Bailey  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A47

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
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I wholeheartedly support the removal of the proposals for Site A47 from the Local Plan.  

What changes (2016)/further amendments (2017) do you suggest should be made to the document?  

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<th>Comment ID: pslp171/1057</th>
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I support the removal of Wanborough from the transport intersections definition.  

What changes (2016)/further amendments (2017) do you suggest should be made to the document?  

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<th>Comment ID: pslp171/1055</th>
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I welcome the clearer wording regarding timing, phasing and application of planning conditions and obligations. It is imperative that no developments should be approved without clear, acceptable and funded plans in place to provide adequate and effective infrastructure of all types and that even where approval has been given, development must follow provision of infrastructure and not proceed without such infrastructure.  

What changes (2016)/further amendments (2017) do you suggest should be made to the document?  

Attached documents:
I still object to Policy P2 as redrafted since it still does not address a very large proportion of the thousands of objections made to the previous version. I particularly object to the reference in paragraph 1 to the Policies Map: the words “as shown designated on the Policies Map” must be deleted if this paragraph is to be of any use at all. I object to the proposals that the settlements of Normandy, Flexford and Walden Cottages, and the traveller sites to the rear of Palm House Nurseries (A49) and Whittles Drive (A50), should be inset from the Green Belt. These are all areas and sites contributing to the openness of the Green Belt and also contributing to the views to and from the Hogs Back AONB. I also object to the insetting of other villages from the Green Belt and “infilling” of others and wholesale extension of settlement boundaries across the Borough. Such changes ignore the importance of a permanent Green Belt preventing urban sprawl and providing a “green lung” which should be protected, with any individual changes being subjected to rigorous scrutiny and being dependent on clear demonstration of exceptional circumstances justifying any over-riding of the Green Belt provisions. I would also point out that para 4.3.13 is incorrect and misleading in saying that a long list of villages are now inset from the Green Belt – this simply refers to GBC’s proposal last summer, to which there have been huge objections from residents and which we hope will be rejected through the Local Plan process.

I object to the proposals for amendments to the current Green Belt boundaries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I strongly object to the building a possible 6000 new homes on green belt land, we are in Charlock Way Burpham and a development of about 40 new houses and apartments have caused problems in New Inn Lane, and Burnet Avenue with on road parking, trying to get in and out now is very difficult, and dangerous when trying to cross the road and for children walking out in between parked cars, I hope you think very hard about loosing our green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Comment ID:</th>
<th>PSLPP16/2122</th>
<th>Respondent: 15264225 / Mel McVickers</th>
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7) I object to the infrastructure schedule. This schedule does not include any indications on how infrastructure will be affected. Appendix C

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>PSLPP16/2124</th>
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3) I object on the basis that the congestion that will result on already overcrowded overused roads in the area will bring the area to a standstill and increase the risk of serious accidents. Policy I1

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID:</th>
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5) I object to the development of the Garlick Arch site as there is no provision for an increase in relation to Doctors Surgeries, the existing village surgery is under constant strain already. Policy P2

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
8) I object to the lack of proper infrastructure planning for the sites, I am alarmed that these plans have been put forward when there appears to be no inclusion of how the infrastructure would be required would be developed. There is a huge lack of incompetence of behalf of the planning authority. Policy I1.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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2) I object to the proposal to develop the green belt in this area, the removal of the green belt is a ridiculous proposition when first consideration for development should be existing industrial areas and brown field sites. Policy P2

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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4) I object to the developments to the areas which are at risk of flooding. I live close to the Garlick Arch area and that particular area has a high risk of flooding and as flooding has been a huge problem in many areas throughout the country where people have been made homeless, why should future residents be subjected to such a risk. Policy P4

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/2120  Respondent: 15264225 / Mel McVickers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1) I object to the proposal to build around 14000 new homes in and around the villages within a 3 mile radius of Ripley village. The communities have evolved over many years and their patient gradual growth is acceptable but to saturate the area with that number of properties is not sustainable. Some of the road network is at a point of being dis functional as an example, the extremely narrow section through West Clandon. Policy S1

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2125  Respondent: 15264225 / Mel McVickers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

6) I object to the Borough wide strategy, as most of the proposed development is concentrated around the villages of Ripley, Send, Clandon and Wisley. There has been no acceptable reason why all of these villages in a concentrated area should be ruined when there are more suitable sites within the Borough. If the Gosden Hill site is developed that in itself will impact hugely on the villages. Policy S2

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/406  Respondent: 15264225 / Mel McVickers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

9) I object to the last minute inclusion by the planning authority which only gave 2 weeks notice.

10) I object to the almost non existence consultation period, which is a heavy handed approach forcing something through without due consideration of the thoughts of current residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1726  Respondent: 15264225 / Mel McVickers  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Clockbarn Nursery, Tannery Lane Policy A 42.

I object to policy A 42 at Clockbarn in Tannery Lane because.

1. It will increase the access problem for traffic in Tannery Lane and the A247 junction, which is already considered dangerous by regular users.
2. Our green belt is being taken away from us and this must not be allowed to continue.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1725  Respondent: 15264225 / Mel McVickers  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. **Land at Garlick’s Arch, Send Marsh, Policy A 43.**

I object to policy A 43 at Garlick’s Arch because.

1. The council have totally disregarded the thousands of objections which have been made people who live in the area.
2. Why make provision for travelling show people when there is absolutely no indication that there is a need for this facility in this area.
3. The number of homes suggested 400 plus is serious overdevelopment in our small village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID:</th>
<th>pslp172/1724</th>
<th>Respondent:</th>
<th>15264225 / Mel McVickers</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A58</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
<td>Land at Burnt Common, London Road, Policy A 58</td>
</tr>
</tbody>
</table>
| I object to policy A 58 at Burnt common because. | | | | 1. There is no obvious need to build a warehouse development in the middle of a green belt when the industrial site a Slyfield Green Guildford could comfortably accommodate more warehouse development.  
2. As with policy a 43 this policy would seriously effect the traffic volume which is already a huge problem in this location. |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? | | Attached documents: | | |

<table>
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<th>Comment ID:</th>
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<th>Respondent:</th>
<th>15264225 / Mel McVickers</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
<td>Land at Burnt Common, London Road, Policy A 58</td>
</tr>
</tbody>
</table>
Green Belt Policy 2 at paragraph 4.3.15

I object to the proposal to insert Send Business Park from the green belt because.

1. Huge traffic problems already exist in this area and the proposed development would only increase the problems.
2. As with each of the previous policy objections, this policy will seriously effect the beauty of the green belt in this area, and with diligent investigation the planning authority at Guildford Borough Council should show concern for the loss of the green belt and find sites which will be less affected and are not as attractive for residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/686  Respondent: 15264449 / Elaine McVickers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

5) I object to the development of the Garlick Arch site as there is no provision for an increase in relation to Doctors Surgeries, the existing village surgery is under constant strain already. Policy P2

7) I object to the infrastructure schedule. This schedule does not include any indications on how infrastructure will be affected. Appendix C

8) I object to the lack of proper infrastructure planning for the sites, I am alarmed that these plans have been put forward when there appears to be no inclusion of how the infrastructure would be required would be developed. There is a huge lack of incompetence of behalf of the planning authority. Policy I1.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2128  Respondent: 15264449 / Elaine McVickers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
3) I object on the basis that the congestion that will result on already overcrowded overused roads in the area will bring the area to a standstill and increase the risk of serious accidents. Policy I1

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2127   Respondent: 15264449 / Elaine McVickers   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2) I object to the proposal to develop the green belt in this area, the removal of the green belt is a ridiculous proposition when first consideration for development should be existing industrial areas and brown field sites. Policy P2

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2129   Respondent: 15264449 / Elaine McVickers   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4) I object to the developments to the areas which are at risk of flooding. I live close to the Garlick Arch area and that particular area has a high risk of flooding and as flooding has been a huge problem in many areas throughout the country where people have been made homeless, why should future residents be subjected to such a risk. Policy P4

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2126   Respondent: 15264449 / Elaine McVickers   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1) I object to the proposal to build around 14000 new homes in and around the villages within a 3 mile radius of Ripley village. The communities have evolved over many years and their patient gradual growth is acceptable but to saturate the area with that number of properties is not sustainable. Some of the road network is at a point of being disfunctional as an example, the extremely narrow section through West Clandon. Policy S1

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2130  
Respondent: 15264449 / Elaine McVickers  
Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

6) I object to the Borough wide strategy, as most of the proposed development is concentrated around the villages of Ripley, Send, Clandon and Wisley. There has been no acceptable reason why all of these villages in a concentrated area should be ruined when there are more suitable sites within the Borough. If the Gosden Hill site is developed that in itself will impact hugely on the villages. Policy S2

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/407  
Respondent: 15264449 / Elaine McVickers  
Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
9) I object to the last minute inclusion by the planning authority which only gave 2 weeks notice.

10) I object to the almost non existence consultation period, which is a heavy handed approach forcing something through without due consideration of the thoughts of current residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/1714  Respondent: 15264449 / Elaine McVickers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **Clockbarn Nursery, Tannery Lane Policy A 42.**

   I object to policy A 42 at Clockbarn in Tannery Lane because.

   1. It will increase the access problem for traffic in Tannery Lane and the A247 junction, which is already considered dangerous by regular users.
   2. Our green belt is being taken away from us and this must not be allowed to continue.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/1715  Respondent: 15264449 / Elaine McVickers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **Land at Garlick’s Arch, Send Marsh, Policy A 43.**

   I object to policy A 43 at Garlick’s Arch because.

   1. The council have totally disregarded the thousands of objections which have been made people who live in the area.
   2. Why make provision for travelling show people when there is absolutely no indication that there is a need for this facility in this area.
   3. The number of homes suggested 400 plus is serious overdevelopment in our small village.
Land at Burnt Common, London Road, Policy A 58

I object to policy A 58 at Burnt common because.

a. There is no obvious need to build a warehouse development in the middle of a green belt when the industrial site at Slyfield GreenGuildford could comfortably accommodate more warehouse development.

b. As with policy a 43 this policy would seriously effect the traffic volume which is already a huge problem in this location.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Green Belt Policy 2 at paragraph 4.3.15

I object to the proposal to insert Send Business Park from the green belt because.

1. Huge traffic problems already exist in this area and the proposed development would only increase the problems.
2. As with each of the previous policy objections, this policy will seriously effect the beauty of the green belt in this area and with diligent investigation the planning authority at Guildford Borough Council should show concern for the loss of the green belt and find sites which will be less affected and are not as attractive for residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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</table>

I am particularly concerned at the huge increase in housing proposed for the part of the borough near where I live (Burpham) and the loss of Green Belt as a consequence.

Of particular concern is the lack of attention to the necessary infrastructure given the very large increase in demand it would create, particularly in relation to highways. The already seriously overstretched roads in Burpham where there are frequent major traffic problems already need much greater attention including enhancement of the Burpham junction with the A3 to 4 way if there is to be any significant development in the area. An enhanced junction at Burnt Common will not overcome this problem.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPA16/3564</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
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</table>

I object to the proposed Infrastructure Schedule (Appendix C)

There is no schedule for Garlicks Arch (A43); the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<th>Comment ID: PSLPA16/3563</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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</table>

I object to the figure of 693 houses per annum in the borough being too high (Appendix D)

GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPS16/6866</th>
<th>Respondent: 15265377 / Emma Thompson</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

This is disastrous as the increased volume of traffic would impact the local communities. The increased traffic from London (M25) to Woking would go through Burnt Common, Send and Old Woking, which currently cannot cope with the existing traffic. This is unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<table>
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<th>Comment ID: PSLPS16/6867</th>
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</table>
I object to the inclusion of the land at Garlicks Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick's Arch is Green Belt and has ancient woodland and has a thriving wildlife habitat, which should be protected. There is no infrastructure, it floods and the the Draft Local Plan Infrastructure schedule does not provide for this site at all.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1082  Respondent: 15265377 / Emma Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to you to object against the local development plan that has been proposed by Guildford Borough Council for the villages of Normandy and Flexford (Site A46/A47). You are proposing to build 1,100 new homes, a 1500 pupil secondary school, 6 show people pitches with yards and a nursing home in the rural villages of Normandy and Flexford. This massive development will be built on a huge area of Green Belt land. There are many issues that have been overlooked by you and I am not fully convinced you realise the implications of this build.

The land proposed is a vast square of green belt land, I don’t think I have ever seen such a large piece of Green Belt land sacrificed for development in this area before. If this build goes ahead it will destroy ancient woodland, including 500 year old oak trees that line the old drive of Westwood Place which is a listed building. This drive is now a public footpath and was once joined to Windsor Great Park, the land is steeped in history. The build will disturb defenceless wildlife which will struggle to thrive if forced to move and it will also destroy hedgerows and grasslands resulting in a decline in our bird and bee populations, which are already under threat. There is a proposal to create an area to move the wildlife too which is idiotic. Wildlife will stand a better chance if they are left alone in their natural habitat rather than forced out and ultimately destroyed. This build will change green fields into a large urban sprawl and therefore encroaching on the Surrey Hills Area of Outstanding Natural Beauty. The build will also destroy valuable agricultural land when the UK has already lost a total 2000sq kilometres in the last six years. The area is very prone to flooding and is saved most winters by the surrounding natural streams taking most of the brunt of the rain, a natural flood defence. The site would be built directly over these streams. Where would the water go? Most probably into the homes of Normandy and Flexford residents. Flooding has always been a problem in Normandy, increasing housing would only increase the risk.

This build will increase the number of homes in Normandy and Flexford by 100% each of these homes is likely to have at least one car and so the traffic situation in the area will be chaotic. In addition the proposed 1500 pupil secondary school will also add to a distavorous traffic situation during drop off and pick up times. The road infrastructure around Normandy and Flexford would not be able to cope with this drastic increase in traffic, vast number of homes will be caged in by a single lane railway bridge which will result in daily lengthy tail backs. This increase in traffic will choke a village blessed with clean air by increasing pollution, especially at peak times, risking the health of Normandy and Flexford residents. This proposed build is likely to take 15 years so not only will the end result cause a dramatic change in the road situations in the area but it will cause 15 years of disruptions, fumes, dust, traffic lights, road works and it wouldn’t surprise me if you saw a rise in illnesses within the village especially in the elderly and young as a result in this rise of pollution.

Normandy and Flexford are rural villages. This new proposal will merge them into one Normandy town, killing the rural feel and community forever. I understand the need for new homes in our country, I am 29 years old and getting on the housing ladder will always be a struggle, especially in the Surrey area but I do not understand how GBC can overlook so many brownfield sites that we have in the area and think it logical to ignore these and destroy our wonderful countryside
and build on Green Belt Land instead. There are many more area options for this build, if it is actually needed, that do not encroach on Green Belt land and I am confident that you have a good idea of these areas also. In my opinion GBC have taken the easy way out and this proposal is developer led as there was no mention of A46/A47 in the 2014 consolation and in fact this site was safeguarded so this is only in place because a developer has approached the council and offered them a secondary school in order to build their homes which has no respect for the principals of town and country planning.

The need for secondary school on site A46/A47 has not been proven. Every neighbouring secondary school to Normandy is currently unsubscribed and the birth rate which raised in 2011 and 2012 has now reduced so there seems no real need for a new school as we should just be using the spaces available already.

**Kings College** is 57% undersubscribed and if it does reach full capacity there is options for the school to be further expanded to accommodate new pupils.

**The New Guildford University Technical College** is opening in 2018 and will take 240 pupils from the age of 14 in its first year doubling to 480 places.

**Christ College** is taking 30 extra pupils a year as it has the capacity to do so and is willing to take more.

**Ash Manor** is undersubscribed by 110 and are supportive of the school being expanded to take more pupils in future. Ash Manor are also very concerned with the prospect of a new secondary school being built just three miles away from them as it will surely effect the amount of new pupils coming to their school.

**Connaught School** is undersubscribe by 90 places.

**Hoe Valley, Woking** will have the capacity of 840, at the moment it only has 120.

In addition to these schools, **Guildford County School** and **St Peter’s School** have already had approval to expand, clearly creating more spaces in these schools also.

The need for a new secondary school in Guildford Borough therefore seems unnecessary and there is no reason for one to be built in Normandy. If you wish to proceed with this proposal of a new secondary school the SCC Education officers need to demonstrate a clear need for a school at this location.

Surrey County Councils policy, dating back to March 2013 states that *We will maintain the Green Belt, Sites of Special Scientific Interest (SSSIs) and other environmental protections, and create a new designation – similar to SSSIs –to protect green areas of particular importance to local communities.*

And the SCC resolves

1. To use its power to protect Surrey’s Green Belt.
2. To support the National Planning Policy Framework (section 9 – paragraphs 79 to 92) and the Government’s policy of protecting the Green Belt.
3. To make Surrey’s MPs and the County’s Districts and Boroughs aware of this resolution.
4. That any Green Belt development in the County is in line with the needs and wishes of Surrey residents.

I do hope these pledges and policies do not fall short as at the moment they are not being followed and the Local Plan does not concur with them. I do hope that GBC will not let a community down by destroying its Green Belt, its wildlife and its rural village feel for ever. We are all so very lucky to live in such a wonderful area of outstanding natural beauty, I do not believe any of us have the right to destroy this land so I ask you to reconsider the Local Plan and site A46/A47 as your arguments do not weigh up and there are clearly more negatives then positives for Normandy, Flexford and Guildford Borough.

**Finally I sate again that I OBJECT to the proposed plan for site A46 and A47.**

*What changes (2016)/further amendments (2017) do you suggest should be made to the document?*
Comment ID: PSLPP16/14926  Respondent: 15265377 / Emma Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14928  Respondent: 15265377 / Emma Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the employment strategy and impact on Garlicks Arch (A43) (Policies E2 and E5)

The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14923  Respondent: 15265377 / Emma Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

This will cause more congestion to the villages of Ripley, Send and Clandon, which have poor condition narrow roads and no footpaths, which are dangerous. More houses will increase this danger and unsustainable volumes of traffic

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/14929</th>
<th>Respondent: 15265377 / Emma Thompson</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of proper infrastructure planning for sites (Policy I1)

The current and existing services are over-stretched now, so where are the infrastructure improvements to support the enormous proposed developments, including medical, public transport, schools?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID: PSLPP16/14931</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the congestion that development will cause to the trunk roads A3/M25 (Policy12)

Both the A3 and M25 need improvements before any developments commence. This is clearly not going to happen in the timescales of the plan, so the proposed developments at Wisley Airfield (A35), Garlicks Arch (A43) and Gosden Hill (A25) should NOT take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14927  Respondent: 15265377 / Emma Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to poor air quality concerns (Policy 13)

The increased congestion that will arise from the massive proposed developments will in turn lead to increased air pollution which will have damaging effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14922  Respondent: 15265377 / Emma Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/14924  Respondent: 15265377 / Emma Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to development in areas at risk of flooding (Policy P4)

The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14921  Respondent: 15265377 / Emma Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the local plan as the development proposed is not sustainable (Policy S1)

The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrasctucture. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14925  Respondent: 15265377 / Emma Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the Borough Wide Strategy (Policy S2)

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/691  Respondent: 15265473 / Keith Glenister  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Normandy and Flexford

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have lived in Normandy for over 40 years, one reason for choosing my house being the surrounding green belt.

I am astounded that you can contemplate such a massive building programme on green belt land. Normandy is a small comfortable village and your proposals would completely change this with a dramatic fall in the quality of life and house values.

Over these last 40 years the traffic has grown beyond measure, meaning that it sometimes takes up to 15 minutes just to get out of Nightingale Rd. Every day there are long queues on the A31 heading East. The planned development would dramatically worsen this situation.

It must not go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2537  Respondent: 15265473 / Keith Glenister  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Further to my message yesterday. If this plan goes ahead it will provide a major precedent for other breaches of green belt rules. We have a possible example in the Dilkusha planning application just down our road. It must not go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/692  Respondent: 15265569 / Douglas and Sudha Young  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

My wife and I have read the Comments on the 'Proposed Submission Plan' submitted by the East Horsley Parish Council, and are broadly in agreement with the Council.

Being residents in East Horsley, we find that the parking problems in the Village, and at the two railway stations, are worsening all the time, and cannot imagine how it would be if all the proposed new homes are built. The doctors surgery is very busy at the moment, and again, with a great influx of new home owners and their families, it might cause a collapse of the medical facilities, especially in view of the shortage of GPs now-a-days.

We are concerned about the plan to build on Green Belt land as well.

There is the other side of the coin however, in that more houses are needed that are affordable by young families. Also for elderly folk to downsize to.

Horsley is a very pleasant village, with more, perhaps, elderly people than is the norm in small communities. The village serves them extremely well. Most do not want to leave the village when downsizing their properties and so losing touch with all their friends.

So, knowing that you have a very difficult target for new homes to meet, We would suggest that the arguments made in the East Horsley Parish Councils letter of the 13th June 2016 are given very serious consideration in order to reduce the knock-on effects in the future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/693  Respondent: 15265793 / Sam Rowley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
10 I OBJECT TO THE LAKE OF ANY EVIDENCE FOR THE ALLEGED HOUSING NEED NUMBERS
11 I OBJECT TO THE LACK OF IMMEDIATE PROVISION FOR NEW SCHOOL AND DOCTORS
12 I OBJECT TO GUILDFORD BOROUGH COUNCIL BEING RUN AS PROFIT MAKING BUSINESS.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1083  Respondent: 15265793 / Sam Rowley  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2  I OBJECT TO SITE A43 GARLICKS ARCH

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1084  Respondent: 15265793 / Sam Rowley  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3  I OBJECT TO SITE A43A THE ON AND OFF RAMP AT CLANDON

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45</th>
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<td>4 I OBJECT TO SITE A45 THE TALBOT</td>
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<td>5 I OBJECT TO SITE A57 THE PADDOCKS</td>
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7  I OBJECT TO THE DISPROPORTINATE AMOUNT OF DEVELOPMENT IN ONE AREA

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID:</th>
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8  I OBJECT TO THE LIMITITED CONSULTATION PERIOD

9  I OBJECT TO THE LAST MINUTE INCLUSION OF NEW SITES WITH LESS THAN 2 WEEKS NOTICE

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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07 I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch is protected from development as Green Belt. There are no exceptional circumstances which allow for it’s removal from the Green Belt (Policy P2). Central Government state clearly that housing need is not an exceptional circumstance.

The Plan states the preference is to use of previously developed land, but GBC have removed a brownfield site at Burnt Common replaced it with Garlick’s Arch.

The site is not appropriate because:

• There is no sustainable transport infrastructure.
• The site is liable to frequent flooding
• It has Ancient woodland and is a wildlife habitat, but no wildlife report for the site is in the Plan.
• There are no plans to improve local schools, medical or utilities to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

03 I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

There is too much traffic in our villages already and this plan will cause more congestion in Ripley, Send and Clandon, with no plan to improve that.

The rural roads in this area are narrow, in poor condition and have no footpaths. 5000 more houses means dangerous and unsustainable traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
05 I object to the lack of proper infrastructure planning for sites (Policy I1)

The Plan does not identify adequate infrastructure improvements to support the huge scale of development, especially at Garlick’s Arch (A43) which has no infrastructure projects in the Infrastructure Schedule to support it. Local services, utilities and sewerage, doctors etc. are at or close to capacity.

There are no plans to improve the capability of the medical and police/emergency services to cover the 5000+ houses in the north east of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2136  Respondent: 15265889 / Christine Croston  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

04 I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

The A3 or M25 would have to be improved before any development is done. Highways England has no plans to even start considering improving the A3 before 2020. Clearly no real improvements are possible in the timeframe of this Plan so the developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), should not take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2133  Respondent: 15265889 / Christine Croston  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

TO THE PLANNING INSPECTOR

I wish to object to the proposal in the local plan as under:

01 I object to not protecting the Green Belt (Policy P2)
I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick’s Arch (A43).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2134  Respondent: 15265889 / Christine Croston  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

02  I object to the Local Plan as the development proposed is not sustainable (Policy S1)

13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve the infrastructure for Garlick’s Arch.

The development should be in urban areas where there is sustainable transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2138  Respondent: 15265889 / Christine Croston  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

06  I object to the Borough Wide Strategy (Policy S2)

GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.
The Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing.

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Site Allocation A42**

5.5 Proposed Site Allocation A42: Clockbarn Nursery, Tannery Lane, Send (Page 144), is allocated for new homes (Class C3), with the gross number of homes provided over the plan period now shown as having increased from 45 homes to 60.

5.6 The increase in the number of dwellings identified in the allocation is supported. This represents a more realistic reflection of the capacity of the site to provide new housing if this is to be done in an efficient manner which optimises the nature of the opportunity that exists to do this. It is considered that the optimal capacity of the site is higher than 60 dwellings and that there remains additional capacity to provide housing at an appropriate density. Through careful and sensitive design, particularly in relation to the context provided by adjacent areas of housing, the capacity of the site and the contribution that this makes towards providing new housing whilst avoiding the need to allocate additional sites elsewhere in the Borough (particularly in more sensitive or less sustainable areas), can be maximised.

5.7 The addition of Requirement (3) in the summary table relating to Policy A42 on Page 241 of the document reflects the addition of the designation of the area as the River Wey Navigation. This amendment is welcomed since it affords appropriate recognition of the presence of the River Way Navigation and the proximity of the site to the river itself. It is acknowledged that new development would need to respect the setting of the river corridor and ensure that there is no detrimental impact.

Please see attached for context of representations.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Policy A42: Land at Clockbarn Nursery, Tannery Lane, Send

6.1 The revised policy position in relation to the Clockbarn Nursery site which recognises its increase in capacity from 45 to 60 dwellings is welcomed. The reasoning for this outlined in the Land Availability Assessment (2017 Addendum), is that the scale of the allocation has been “Reconsidered in light of further evidence and understanding of potential capacity”.

6.2 Danescroft (Send) LLP, remain committed to achieving the redevelopment of the Clockbarn Nursery site in a manner which is appropriate to the context provided by the built form in the immediate vicinity, while continuing to make efficient use of land. This is particularly the case since other potential development sites within or adjoining Send are no longer anticipated to come forward as part of the revision of the Local Plan.

6.3 it is therefore considered that a density of approximately 25dph which would result from a development of 60 dwellings, would fail to make efficient use of land, particularly since this relates to a relatively unconstrained site immediately adjoining an existing settlement which is previously developed in character and nature.

6.4 In light of the reduction in the number and range of sites identified elsewhere in the Borough, it is considered that any new housing development should be expected to provide a higher density of housing with potential to provide up to 40dph. Initial master planning and feasibility work has confirmed that a density of 40dph can be achieved alongside the provision of on-site open space to meet the required standards. Providing new residential development at this density would also reflect the context of existing housing areas elsewhere in Send. Providing 40 dwellings per hectare would better reflect the optimum density for dwelling provision and would represent a more appropriate and sustainable quantum of development in this location, while reducing the need for additional housing to be provided in less suitable locations for development elsewhere in the Borough.

6.5 A higher density housing allocation would result in a greater number of market and affordable homes being provided. The latter would be a proportion of the overall number of dwellings being provided. Therefore, the net effect of increasing the allocation would be to increase the number of affordable homes being provided as a result of its development. The Sustainability Appraisal Report (which accompanies the Local Plan: Strategy and Sites), refers to the need to meet the full extent of both objectively assessed (OAN), and affordable housing needs, a higher rate of dwelling provision than that being promoted and planned for in the draft Local Plan would be required.

6.6 The presence of only one other allocated housing site elsewhere in Send which could be developed to provide for new housing reflects the fact that this is one of only two sites considered suitable for providing additional housing to meet local needs in the village for the duration of the plan period. In order to facilitate its development it is essential that this opportunity is maximised, particularly given the presence of Green Belt boundaries drawn tightly around the defined limits of Send where there is little scope for further development.

6.7 In conclusion, the proposed allocation of the site at Clockbarn Nursery for redevelopment as housing and its removal from the Green Belt are supported. Policy A42 identifies the site as suitable for residential development, and proposes that it is allocated for approximately 60 homes. We fully support the proposed allocation of this site for residential development which would represent a significant enhancement to the local environment as well as providing much-needed new housing. However, it is considered that the site has the potential to make a greater contribution towards the housing supply than is currently envisaged. The approach to achieving this is set out in the representations.

Conclusion

6.8 The proposed amendments to the Guildford Local Plan: Strategy and Sites are generally regarded as positive changes to the plan which more accurately reflect the potential and suitability of Site A42: Clockbarn Nursery, Tannery Lane, Send, to provide new housing. The increase in the housing allocation at this site from 45 to 60 dwellings reflects the reassessment of its capacity by the local planning authority and represents a recognition that this represents one of only two sites in or
adjoining Send that can provide new housing for to accommodate growth over the timescale associated with the new Local Plan.

6.9 The reduction in the scale of dwelling provision across the Borough is however of some concern given the previous under-delivery of housing across the Borough and throughout the wider housing market area, as is the differential phasing of housing provision with higher rates of dwelling provision anticipated later in the plan period. Danescroft (Send) LLP would support the use of the previous dwelling provision target of 693 as opposed to 654 in the current iteration of the plan, and for a consistent annual average to be used throughout the timescale of the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  LON.0500GuildfordLocalPlanStrategyandSitesJuly2017.pdf (930 KB)

Comment ID: pslp171/1077  Respondent: 15266273 / Danescroft Land Ltd Danescroft Send LLP  Agent: Pegasus Group (Mike Spurgeon)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy H1

5.1 It is notable that a paragraph has been deleted from Policy H1 (Page 35), which relates to density. The omitted paragraph states that:
“New residential development is required to make the most efficient use of land whilst responding to local character, context and distinctiveness. Residential densities will vary dependant upon the local area context and character and the sustainability of the location. Higher density development will be supported in Guildford town centre.”

5.2 The omission of this paragraph from Policy H1 and the supporting text in the form of Paragraph 4.2.8 are considered to detract from one of the core objectives of the Local Plan, which is to ensure that a sufficient number of new homes are provided in a sustainable manner, and that this makes efficient use of land.

5.3 While it is acknowledged that the requirement for making efficient use of land appears in Policy D4(1) Part (e)2, this reference to density in a policy relating to design, suggests that this is no longer a strategic objective. While the new policy approach in Policy D4 is welcomed, the absence of an explicit reference to providing new homes at an appropriate density at an earlier stage in the Local Plan suggests that this has become a lower priority for the Local Planning Authority. It is considered that planning for housing at an appropriate density and maximising the opportunities for providing new homes in relatively unconstrained locations are key to achieving sustainable development, particularly in the context of a Borough which is heavily constrained due to the presence of widespread Green Belt designations.

Please see attached for full context of representations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?


Comment ID: pslp171/1078  Respondent: 15266273 / Danescroft Land Ltd Danescroft Send LLP  Agent: Pegasus Group (Mike Spurgeon)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Table 1/Table 2

5.4 Following extensive revisions to Table 1 and Table 2, Send is not explicitly recognised in the settlement hierarchy while its role as one of six rural Local Centres is no longer referred to. As such, the sustainability and potential of Send has not been fully considered or accurately reflected.

Please see attached for context of representations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?


Comment ID: pslp17q/153   Respondent: 15266273 / Danescroft Land Ltd Danescroft Send LLP   Agent: Pegasus Group (Mike Spurgeon)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The updates to the Proposed Submission Local Plan: Strategy and Sites reflects a more up-to-date evidence base which in some areas differs from the position set out in the previous iteration of the plan published in June 2016.

The use of a more up-to-date evidence base in itself represents a positive development. Revisiting aspects of the Land Availability Assessment and publication of a 2017 Addendum adds weight and legitimacy to the revised capacity assessments of a number of potential development sites. This additional clarity is welcomed.

The Sustainability Appraisal does not appear to have been updated to reflect some site-specific matters which were highlighted in previous representations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?


Comment ID: pslp17q/156   Respondent: 15266273 / Danescroft Land Ltd Danescroft Send LLP   Agent: Pegasus Group (Mike Spurgeon)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents
Sustainability Appraisal

The Sustainability Appraisal assesses Site A42 and other proposed allocations against a range of criteria which provide an indication of how well it performs as a sustainable location for new housing. An extract of the scoring system and the assessment of Site A42 are enclosed in Appendix A and Appendix B. The site generally scores highly against the relevant criteria in this assessment. However, it is clear that some of the values which have been assigned to this are more negative than would otherwise have been the case.

The following assessment criteria have been used to assess site A42, however, when reviewing these, this particular site has been incorrectly assessed against these criteria and as such it has been assigned an unduly negative value. It is requested that these are reviewed and amended on the following basis:

- Primary School Walking Distance: – The SA records a ‘red’ value (where there would be a walking distance of 2km or more between the site and the nearest primary school), when in fact the 800m walking distance (as measured by Google Maps – see extract at Appendix C), would move this into a ‘light green’ category.
- Previously Developed Land: - The site is currently afforded a ‘red’ value in category 18, as it has not been categorised as previously developed land. However, based on the definition of previously developed land provided in the NPPF, and following pre-application discussions with the local planning authority in 2016, it is clear that this does represent previously developed land. This matter was previously highlighted in representations submitted in July 2016.

The correction of these inaccuracies in the Sustainability Assessment would result in a stronger performance against the criteria and would better reflect how the site performs against these assessment criteria. This would further reinforce the position that this is a highly sustainable location for new housing on the basis of the selected indicators.

Please see attached for context of representations in their full context and the attachments referred to above.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Having reviewed the proposed changes to the document, there is no reason why the Proposed Submission Local Plan: strategy and sites (2017), is not legally compliant.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**


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**Comment ID:** pslp17q/155  **Respondent:** 15266273 / Danescroft Land Ltd Danescroft Send LLP  **Agent:** Pegasus Group (Mike Spurgeon)

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** (No)

The up-to-date evidence in relation to Objectively Assessed Need for housing within the Borough suggests that the annual requirement for dwelling provision (adjusted to reflect constraints and policy considerations) is 654 dwellings per annum. This has been reduced from 693 dwellings per annum in the previous iteration of the plan. There is some concern that the previous record of under-delivery in the Borough (reflected in the latest completion rates of 381 and 297 dwellings per annum in 2015/16 and 2016/17 respectively), will not be addressed by planning for a lower number of dwellings per annum. This would exacerbate the well-documented issues of housing affordability and the ability to deliver key areas of the overall strategy.

Furthermore, the use of the lower figure does not take into account the duty to plan for meeting unmet housing need in adjoining Boroughs or Districts. This is illustrated by the shortfall of 225 dwellings per annum in Woking between the level of housing being planned for (292 dwellings per annum), and the OAN for the Borough. It is therefore considered that the position set out in submissions to the current Waverley Local Plan (Part 1) Examination by the Home Builders Federation (HBF), that more land needs to be released in Waverley and Guildford in order to accommodate the unmet need in Woking.

While the general upward revision of the capacity of key development sites in Guildford is supported, we are concerned that planning for a lower level of dwelling provision in the Borough than was previously (as recently as June 2016), considered a suitable basis for strategic planning, would cause the document as a whole to be considered unsound. It is therefore considered that the Council should revert to the target rate of dwelling provision set out in the Strategy and Sites Local Plan (2016), which equated to a rate of 693 dwellings per annum. Rather than seeking to allocate additional land, further critical examination of the capacity of sites considered suitable for development would be able to account for a substantial increase in dwelling provision.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**


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**Comment ID:** pslp17q/157  **Respondent:** 15266273 / Danescroft Land Ltd Danescroft Send LLP  **Agent:** Pegasus Group (Mike Spurgeon)

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?
Overall Dwelling Provision

The reduced scale of dwelling provision and the revisions to the rate of delivery of new homes in the Borough (with higher rates anticipated later in the plan period), are concerning, particularly given the acknowledged shortfall in the rate of dwelling provision in recent past.

While it is acknowledged that this is designed to account for the provision of infrastructure in advance of new housing on larger sites coming forward, this does not afford recognition to the role of unconstrained sites which can provide housing in the initial years of the new Local Plan. The reliance on a higher rate of dwelling provision in later years rather than an annualised average of 654 dwellings per annum does not incentivise new residential development in the immediate future when it is most needed, not only to provide for established housing needs, but to address the substantial shortfall in dwelling provision in recent years against a much lower target. The extent of this shortfall is well established (hence the need to account for 20% buffer when monitoring delivery against a Five Year Housing Land Supply. Table 1 below highlights this over a 10 year period using figures obtained from Annual Monitoring Reports/Authorities Monitoring Reports.

[See attached document for table]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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<tr>
<td>I object to policy P2 Send, Ripley and Candon being removed from the Green Belt. Send provides a buffer between Guildford and Woking. The particularly vulnerable areas of land behind the school including playing fields and woodland. The land to the right of the cartridge by the Wey Navigation up to the new boundary by the River Wey Navigation up to the boundary fence with Vision Engineering and Land to the left of the cart bridge going up to the old depot on the Wey Navigation. So the council can concrete over the whole area of Ripley Send and Clandon.</td>
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<td>I object to Policy A43 Land at Garlic Arch. This is a new site and was not included in the Regulation 18 draft and has not been consulted on previously. It is Green Belt permanently protected by the NPPF which prevents the merging of settlements. There are no exceptional circumstances since it is covered by and ancient woodland. The proposed industrial site if singularly not required since the latest Employment Land Needs Assessment 2015 (ENLA) shows a reduction of 80 per cent in requirement needs of employment floor space from the previous draft plan. A new four way interchange on to the A3 at Burnt Common to serve this development would create gridlock. Have you ever tried crossing the road especially in the rush hour nigh impossible. This is a ridiculous idea and really needs to be looked at very carefully. A full transparency should be made available and looked into very carefully, otherwise grid lock will be the result. These roads are not suitable for thousands of cars.</td>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A44</td>
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I object to policy A44. Although you may say this is a small development the added traffic would add to the gridlock situation which would arise from all these developments. Also the subsoil on this site contains land fill waste and is currently vented and suitable for building.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Also where are the services such as Doctors Surgeries, Hospitals, Schools at all levels, Community Centres, etc. Existing services in this area are full to capacity

Also is building on school playing fields is not a good idea as there is a national problem with childhood obesity.
Therefore I object to the Guildford Borough Council's draft local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** SQLP16/412  **Respondent:** 15266305 / A Andrews  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):**

I object to the draft local plan

I object to the Guildford Borough Council not following the correct procedure for plans put forward at the last minute. It is deceitful and underhand.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/18662  **Respondent:** 15266785 / Trenfold Property Limited and Countryside Properties Limited  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):**

Policy P2: Green Belt is the main policy addressing Green Belt matters. A significant amount of the proposed policy is devoted to regurgitating national planning policy. This is not necessary and indeed unless all paragraphs are quoted word for word, the meaning as set out in the NPPF then becomes altered, without justification.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** SQLP16/554  **Respondent:** 15266785 / Trenfold Property Limited and Countryside Properties Limited  **Agent:** Boyer (Michelle Thomson)
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

Please see report prepared by Boyer on behalf of Trenfold Property Limited and Countryside Properties UK Limited for further details.

Green Belt Assessment

First, the GBCS considers that a land parcel either contributes or not to a specific Green Belt purpose (i.e. with the parcel scoring either 1 or 0) without providing any quantification or the degree of that contribution (for example the extent to which a land parcel may make towards a particular Green Belt purpose).

1.13 Second, as a result of this first limitation, the methodology of the GBCS does not allow for any detailed form of ranking to assess the relative contribution each land parcel makes towards the purposes of including land within the Green Belt. The GBCS did not therefore carry out any form of comparative assessment between the identified PDAs/MDPAs.

1.14 Notwithstanding this, the GBCS does identify a number of small PDAs that are considered not to significantly compromise the land parcel score as a whole. These have included sites that have subsequently been proposed as site allocations or safeguarded sites within the previous draft Local Plan (2014) (site references 74-76). Our client’s site was previously identified as safeguarded land (site reference 120).

1.15 Boyer has adopted a scoring methodology to address these issues and quantify the contribution made by each PDA/MPDA towards the purposes of including land within the Green Belt. The aim is to build upon the methodology of the GBCS by enabling a comparison between potential sites already identified through the Local Plan process.

1.16 This approach, together with the sustainability methodology adopted within the GBCS, has been applied to the 11 PDAs/MPDAs surrounding Send, Send Marsh & Burntcommon and Ripley.

1.17 This assessment concludes that the site, at best, makes only a very limited contribution to the purposes of including land within the Green Belt. When compared with the PDAs/MPDAs assessed, it is ranked joint top (i.e. contributes least to the Green Belt) along with land south of Burntcommon. It is considered therefore that its release from the Green Belt would not have any adverse impact on the purpose and function of the Green Belt in this part of the Borough and as such there are no overriding constraints to prevent early delivery of the site.

Previously Developed Land

1.18 The broad approach to removing major previously developed sites from the Green Belt accords with national planning policy and is supported. However, the evidence base to support Guildford’s assumptions about the sites considered to be previously developed appears to be somewhat lacking. There are no details as to the methodology or reasoned justification that has been applied to demonstrate that a site should be considered as previously developed land.

Settlement boundary of villages

1.22 The approach of the Council to respond to the changes in national policy in respect of the Green Belt designation and to protect these areas using development management policies in accordance with the NPPF are supported.

1.23 The addition of ‘Policy D4: Development in urban areas and inset villages’ in the latest draft of the Local Plan which seeks to “promote the efficient use of land” whilst ensuring that “this does not negatively impact upon the quality of the local environment” is also supported.
1.24 Land at Polesden Lane and Send Marsh Road, Send Marsh is bordered on three sides by established housing and defensible boundaries including a footpath to the west (footpath number 46) and a second footpath to the north of the site (footpath number 45). It therefore lies within the effective framework of Send Marsh Village although it does not fall within the proposed settlement boundary as defined by the draft Local Plan.

1.25 Given the evidence presented in previous sections relating specifically to our client’s site at Polesden Lane, Send Marsh with regards to its contribution to the Green Belt and its previously developed land status, the location of the settlement boundary should be redrawn around the entire site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): (No)

Please see report prepared by Boyer on behalf of Trenfold Property Limited and Countryside Properties UK Limited for further details.

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Answer (if comment is on questions 1-7 of the questionnaire): (No)

Please see report prepared by Boyer on behalf of Trenfold Property Limited and Countryside Properties UK Limited for further details.

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<td>We would like the opportunity to express our concerns regarding the Green Belt assessment, factual errors in the Sustainability Appraisal and other site specific matters which are all explained in detail in the report prepared by Boyer on behalf of Trenfold Property Limited and Countryside Properties UK Limited.</td>
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Please see report prepared by Boyer on behalf of Trenfold Property Limited and Countryside Properties UK Limited for further details.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
- [160718 Guildford Local Plan Representations July 2016 - 1.pdf](16.7 MB)
- [160718 Guildford Local Plan Representations July 2016 - 2.pdf](15.8 MB)

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**Comment ID:** pslp173/663  **Respondent:** 15266785 / Trenfold Property Limited and Countryside Properties Limited  
**Agent:** Boyer (Michelle Thomson)

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix D: Evidence base

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

1.13 Since the previous 2016 Regulation 19 consultation Guildford Borough Council have updated and expanded their evidence base for the Local Plan. A summary of the key alterations and additions are set out below:

- A new document entitled the ‘West Surrey Strategic Housing Market Assessment (SHMA) Guildford Addendum’ has been produced;
- The Employment Land Needs Assessment (ELNA) has been updated;
- A Retail and Leisure Needs Study Addendum has been produced. This supplements the Retail and Leisure Study update of 2014;
- The Travellers Accommodation Assessment (TAA) has been updated;
- A Water Quality Assessment report has been produced;
- The Sustainability Appraisal (SA) and Habitats Regulation Assessment (HRA) have been updated;
- A new Land Availability Assessment (LAA) Addendum has been produced;
- An Open Space, Sports and Recreation Assessment has been produced;
- An Assessment of Sites for Amenity Value has been prepared;
- An Addendum to the Strategic Highway Assessment Report has been prepared;
- The Guildford Borough Transport Strategy has been updated; and
- A Borough, Economy and Infrastructure EAB Report Sustainable Movement Corridor – Update has been produced.

1.14 In addition the series of topic papers produced as part of the evidence base for the emerging Local Plan has also been updated. There are now a total of 11 topic papers associated with the 2017 version of the emerging Local Plan.

1.15 The most significant update to the evidence base has been the preparation and publication of the ‘West Surrey Strategic Housing Market Assessment (SHMA) Guildford Addendum’. The significance is that the findings of this report have had the most far-reaching implications on the 2017 version of the emerging Local Plan.

1.16 Specifically the SHMA Addendum, which is intended to supplement the West Surrey SHMA previously published, reduces the Objectively Assessed Need (OAN) for Guildford from 693 homes per year to 654 homes per year.

1.17 As a consequence of this reduction a number of the other evidence base documents and topic papers have been revised alongside draft policies within the emerging Local Plan, proposed site allocations and the policies maps.

1.18 The SHMA Addendum is stated to have taken into account the latest population and household projections, the latest post-Brexit economic projections and the latest 2015 midyear population estimate.
This section considers the main implications of the key changes proposed of relevance to the promotion of Land at Polesden Lane and Send Marsh Road. The key changes are considered under the following topics:
- Implications of the SHMA Guildford Addendum Report 2017;
- Implications for addressing the Duty to Co-operate; and
- Implications for Housing Delivery and Five Year Housing Land Supply;

**SHMA Guildford Addendum Report 2017**

2.2 As set out in Section 2 of this report one of the most significant influences on the 2017 version of the emerging Local Plan has been the addition of the ‘West Surrey Strategic Housing Market Assessment (SHMA): Guildford Addendum Report 2017’ to the evidence base.

2.3 The Council notes in paragraph 2.9 of their Topic Paper on Housing Delivery (June 2017) that this document “sits alongside and supplements the West Surrey SHMA. It takes account of the latest population and household projections, the latest post-Brexit economic projections and the latest 2015 mid-year population estimate.”

2.4 As a result of this Addendum Report the Objectively Assessed Need (OAN) for Guildford has been revised from 693 homes per year to 654 homes per year. The Plan period has also been revised from 2013 – 2033 to 2015 – 2034.

2.5 Guildford Borough Council has sought to use this as justification to reduce the total number of homes proposed to be delivered in the Guildford Borough from 13,860 homes in the 2016 version of the emerging Local Plan to 12,426 homes in the 2017 version of the Local Plan.

2.6 However Paragraph 47 of the National Planning Policy Framework (NPPF) requires Local Planning Authorities to “boost significantly the supply of housing”.

2.7 It is apparent from the findings of the Addendum Report in respect of demographic and affordability assessments that the evidence does not support the proposed reduction in the OAN.

2.8 In particular the Addendum Report highlights that “the expected population growth and housing need rise slightly, with a growth of 22,000 persons expected (15.1%)”. Taking account of the longer term migration trends housing need is noted to be between 521 and 584 dwellings per annum (dpa). The Addendum Report utilises the mid-point of 552 dpa. This represents a significant increase from the demographic need of 517 dpa set out in the 2015 West Surrey SHMA. In addition this is only the mid-point assessment and therefore there is no certainty that the full need will be met by using this figure rather than the highest demographic projection of 584 dpa.

2.9 With regards to affordable housing the Addendum Report also illustrates that need has increased from 478 dpa to 517 dpa. In addition “the latest data shows lower quartile house prices…are 11.5 times earnings in the Borough…and points to affordability pressures within the local market”. Paragraph 5.32 also acknowledges that “house price growth has accelerated in the Borough since mid-2013”.

2.10 As acknowledged in paragraph 8.14 of the Addendum Report “the evidence conclusively supports an upward adjustment to improve affordability, taking account of the market signals and affordable housing needs evidence”.

2.11 It is therefore apparent that there is a clear and increasing need for housing within the Borough. The demographic and affordability findings of the Addendum Report therefore do not support the proposed reduction in OAN incorporated into the 2017 version of the emerging Local Plan.

2.12 We do not therefore support the lower OAN figure utilised in the 2017 Proposed Submission version of the Local Plan. As well as being based on an evidence base which has been prepared contrary to national policy the most recent demographic and affordability findings clearly illustrate a requirement for uplift in housing figures not a reduction. This amendment to the Local Plan is therefore considered to be unjustified and unsound.

**Woking**

2.21 As acknowledged by Guildford Borough Council in paragraph 4.6 of the Housing Delivery Topic Paper Woking have a substantial unmet need estimated by Guildford Council to be in the region of 3,150 homes.
2.22 However, Guildford Borough Council set out in both the Housing Delivery and Duty to Co-Operate Topic Papers that they “do not consider that we can suitably accommodate any unmet need arising from Woking”.

2.23 This is an unjustified statement from the Council particularly given that the previous Regulation 19 Local Plan from 2016 proposed higher housing numbers which the Council considered at the time were acceptable and sustainable.

2.24 Regardless of the failure to provide sound justification for the reduction in housing numbers if the Council now considers that it no longer requires the amount of housing delivery previously proposed then the remainder of this housing supply should be allocated to meeting Woking’s unmet needs.

2.25 A reduction to the OAN should not necessarily equate to a reduction in the amount of housing to be delivered. Even if Guildford Borough Council were able to justify a reduced OAN for Guildford, the fact that their previous version of the Local Plan demonstrated a higher delivery of housing numbers was possible, demonstrates they are able to contribute at least this number of houses to meeting their duty to co-operate, in this case through meeting Woking’s unmet housing requirements.

2.26 The Council set out in their Housing Delivery Topic Paper the need for flexibility within their own Local Plan to ensure sufficient delivery of housing. Furthermore they also highlight that they have carried out an assessment of the sites removed from the Local Plan since the 2016 public consultation as options for meeting unmet need from Woking (Paragraphs 4.17 to 4.28).

However, this assessment is highly limited and inadequate. It fails to recognise the significance of meeting the unmet housing needs within the HMA and instead assesses sites in an insular manner considering only the benefits or harm to Guildford.

2.28 This assessment also only considers the sites which have been discounted from the 2016 version of the Local Plan and fails to consider the ability of Guildford Borough to meet the unmet needs of Woking on a holistic basis as part of their site selection process.

2.29 Indeed the Inspector of the emerging Waverley Local Plan noted in the recent Examination in Public that it was appropriate for both Waverley and Guildford to accommodate the unmet need from Woking. In particular he recommended that both Waverley and Guildford Council accommodate the equivalent of 150 homes for Woking each year.

2.30 He also expressed his surprise that Guildford had removed a number of draft allocations from the Plan but would still not be meeting any unmet need from Woking.

2.31 Specific reference was made to previously proposed Green Belt releases which Guildford Council consider there are no longer exceptional circumstances to justify. However, the Inspector expressed his view that meeting unmet housing need should be treated as a high priority. Indeed it should certainly be considered as a significant benefit to Green Belt release within the Guildford Borough.

2.32 However, the Council demonstrates no evidence of assessing their draft site allocations against the potential to meet the unmet needs of Woking. Instead the preparation of the Local Plan has concentrated solely on the advantages and disadvantages to the Guildford Borough in isolation.

2.33 The ‘Guildford Borough Proposed Submission Local Plan: Strategy and Sites (2017)’ therefore does not currently satisfactorily demonstrate that it has been prepared in a positive manner. The Council should seek to address this matter before the emerging Local Plan proceeds to Examination.

**Housing Delivery and Five Year Housing Land Supply**
2.34 Paragraph 47 of the NPPF requires Local Planning Authorities to “identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements”. In addition “where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply”.

2.35 Where a local planning authority is unable to demonstrate a five year supply of deliverable housing sites then “relevant policies for the supply of housing should not be considered upto-date” in accordance with paragraph 49 of the NPPF.

2.36 As acknowledged by the Council in their Housing Delivery Topic Paper the decision to rely substantially on strategic sites to deliver housing during the proposed Plan Period means that their existing backlog, created by historic poor delivery levels, is unlikely to “be capable of being met in the first five years of the plan”.

2.37 The strategy adopted by Guildford Borough Council in the emerging Local Plan therefore fails to address the existing backlog of housing need early in the Plan period but instead delays the delivery of this essential housing until much later in the Plan period.

2.38 Indeed the updated Housing Trajectory published in the Land Availability Assessment (LAA) Addendum 2017 which forms part of the evidence base for the emerging Local Plan demonstrates that housing delivery will not exceed the cumulative target until 2025/2026. Given that the Plan period commences in 2015 this represents a decade of housing delivery before Guildford Borough addresses the backlog.

2.39 This clearly demonstrates that the strategy proposed by Guildford Borough Council in regards to housing delivery results in too much housing delivery being planned towards the end of the Plan period owing to “the reliance on a number of strategic sites which by their very nature take longer to deliver” (Paragraph 4.189, Housing Delivery Topic Paper).

2.40 This is re-iterated in Paragraph 4.11 of the Housing Delivery Topic Paper which highlights the “uncertainties related to the delivery of certain key infrastructure” and that “a number of our strategic sites are dependent on the delivery of Highways England’s A3 Guildford scheme”.

2.41 Concerns about this approach are set out in detail in our previous representations. In particular the reliance on strategic sites which require the delivery of significant infrastructure in order to come forward. This may have a significant impact on the housing delivery trajectory of the Council who would have limited opportunities to address any issues given the late stage in the Plan period. The risk of the Council being unable to demonstrate a five year housing land supply during the course of the Plan period is therefore much higher.

2.42 The Council should therefore reconsider their approach to site allocation and incorporate a greater range of sites into their proposed allocations. In particular the Council should allocate a greater number of smaller sites (as advocated in our previous representations) to address the substantial backlog and requirement for additional housing in the Borough.

2.43 Land at Polesden Lane and Send Marsh Road could deliver approximately 70 dwellings of both market and affordable housing within the first five years of the Plan period. This will contribute towards meeting the extensive needs which exist within this area as well as within the Borough as a whole at the beginning of the Plan period.

2.44 We have demonstrated through our previous submissions that the existing Green Belt designation associated with this land should be removed. We have also demonstrated that there are no practical constraints to the immediate delivery of this site. Land at Polesden Lane and Send Marsh Road could therefore make a valuable contribution to addressing the lack of housing delivery at the beginning of the Plan period.

2.45 This approach would also reduce the risk of the policies set out in the emerging Local Plan being found out of date in accordance with policy 49 of the NPPF owing to a lack of five year housing land supply.

2.46 In particular between 2019/20 and 2023/24 at least 3,719 dwellings will need to be delivered based on the trajectory proposed in draft Policy S2 and in order to address the backlog of at least 1,319 dwellings expected to have accumulated from historically low delivery rates. (Based on figures taken from the Housing Trajectory in the LAA Addendum 2017). Applying a 20% buffer to this figure to take into account the persistent under delivery of the Council results in a requirement to deliver at least 4,463 new homes in this initial period of the Plan.
2.47 However the Housing Trajectory in the 2017 LAA Addendum identifies only 3,582 homes which can be delivered during this period. As such there is a shortage of 881 new homes in this initial period in order to address the historic backlog and the emerging housing requirements of the Borough even with a revised OAN of 654.

2.48 On this basis the Council would therefore fail to be able to demonstrate a five year housing land supply at the time the Local Plan was to be adopted.

2.49 Given that the Council currently calculates its own five year housing land supply to be 2.36 years the proposed housing strategy put forward in the emerging Local Plan is clearly not effective or justified in its approach.

2.50 The Local Plan would fail to significantly boost the supply of housing within the Borough and would fail to address the historically poor delivery rates and associated backlog of the Council.

2.51 In order to ensure that the Local Plan is found sound at Examination we would therefore strongly recommend that the Council revises its housing trajectory to incorporate a greater number of smaller sites which can deliver in the earlier stages of the Plan period thereby ensuring that the Housing Trajectory is robust and achievable.

2.52 This would accord with paragraph 035 of the NPPG which states that “Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period”.

2.53 As set out in these representations Land at Polesden Lane and Send Marsh Road is an unconstrained site in a sustainable location which is available immediately for development.

**Housing Delivery & Five Year Housing Land Supply**

4.11 As set out in Section 3 of this report the over reliance of the Local Plan on strategic sites expected to deliver housing at the very late stages of the Plan period significantly increases the risk of the Council to be unable to demonstrate a five year housing land supply.

4.12 Indeed based on the information set out in the most recent LAA it would appear that the Council will be unable to demonstrate a five year housing land supply at the point at which the Local Plan is intended to be adopted.

4.13 This is largely as a result of the Council’s inability to address their historic backlog of housing resulting from many years of persistent under delivery in the early plan period.

4.14 The Council have sought to mask this issue by setting significantly lower annual housing target figures in the early Plan period (450 new homes vs an OAN of 654) which subsequently increase significantly to 850 new homes in 2033/34.

4.15 However, it is clearly apparent that the proposed housing delivery strategy set out in the emerging Guildford Local Plan fails to significantly boost the supply of housing or address the historic backlog of the Council early in the Plan period.

4.16 The housing delivery strategy for the Borough should therefore be revised to incorporate a greater number of smaller sites which can be delivered much earlier in the Plan period and provide greater security in respect of the delivery of housing.

4.17 Land at Polesden Lane and Send Marsh Road is an example of a smaller scale site which could deliver these requirements and significantly contribute towards addressing the failings of the current housing delivery strategy.

**Flood Risk**

4.23 Despite our previous representations and updates made to the Sustainability Appraisal in June 2017 Land at Polesden Lane and Send Marsh Road is still incorrectly given a red ranking against flood risk.

4.24 The Council have been provided with evidence to demonstrate that the site is not at risk of flooding and this ranking is therefore incorrect.
4.25 In order to minimise any potential for legal challenge to the Local Plan process, we once again re-iterate that the sustainability appraisal should be revised to take into account the matters raised above and demonstrate how all of the reasonable alternatives have been considered. This is necessary to ensure the soundness of the Plan.

Summary

4.26 In accordance with paragraph 182 of the NPPF in order for a Local Plan to be found sound at examination the Local Planning Authority must demonstrate that it is:
- Positively prepared;
- Justified;
- Effective; and
- Consistent with national policy.

4.27 As demonstrated in these representations the evidence base upon which the 2017 version of the Local Plan is based is not consistent with national policy. In particular the SHMA Addendum Report entirely ignores the HMA within which Guildford lies.

4.28 The proposed revisions to the OAN set out in the 2017 Regulation 19 version of the Local Plan and the amendments proposed to the Green Belt boundaries as a result are not therefore considered to be justified.

4.29 As a result of relying upon this flawed evidence base and the decision to reduce the proposed OAN in the latest version of the Local Plan it cannot be considered to be effective. Indeed it fails to address the increasing need for housing in the Borough and meet the NPPF requirement to “significantly boost the supply of housing”. It also fails to address the existing backlog of housing development early in the Plan period and does not demonstrate a five year housing land supply at the date the Plan would be adopted.

4.30 Finally the Plan cannot be said to be positively prepared given that the SHMA Addendum Report has been prepared in isolation and fails to address the unmet requirements of the neighbouring authority of Woking.

4.31 These matters should be addressed by the Council before the emerging Local Plan proceeds to Examination.

4.32 As demonstrated above Land at Polesden Lane and Send Marsh Road could significantly assist the Council in addressing the shortcomings of the proposed submission version of the Local Plan. The site can deliver additional housing in the early years of the Plan period in a highly sustainable location.

4.33 Contrary to the conclusions of the Council this can be achieved on a previously developed site without any significant adverse impact to the Green Belt and on land that lies within Flood Zone 1. It would also deliver a new justifiable and defensible boundary to the Green Belt.

4.34 Trenfold Property Limited and Countryside Properties (UK) Limited are keen to work in a positive and collaborative manner with Guildford Borough Council to identify the most appropriate facilities for this location and contribute towards the delivery of new housing in the Borough on an unconstrained site which is capable of providing new housing immediately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 170724 Representations.pdf (6.9 MB)
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.1 This statement has been produced on behalf of Trenfold Property Limited and Countryside Properties (UK) Limited (Countryside) in response to the ‘Guildford Borough Proposed Submission Local Plan: Strategy and Sites (2017)’. Countryside is the contractual purchaser for this site and is able to deliver residential development at the site early on in the plan period. A site location plan is attached at Appendix One.

1.2 Land at Polesden Lane and Send Marsh Road is approximately 2.6ha in size and currently comprises scrub grassland together with spoil and hardstanding associated with the previous uses of the site.

1.3 The site is enclosed on three sides by existing residential development. The site is broadly level and featureless with no significant vegetation within the site. The site benefits from vehicular access from Danesfield suitable to serve the proposed development.

1.4 The western boundary of the site comprises of substantial existing mature vegetation which provides a clear definition to the edge of the site and also a significant level of screening.

1.5 These representations provide our formal response to the changes made by the Council between the 2016 and 2017 versions of the emerging Local Plan and its associated evidence base.

1.6 The representations are structured as follows:
- A summary of key changes made between the 2016 and 2017 versions of the Local Plan;
- Implications of the key changes made to the Local Plan since 2016;
- An assessment of the revised housing numbers proposed in the 2017 version of the Local Plan;
- Consideration of the amended Green Belt boundaries now proposed in the 2017 version of the Local Plan; and
- An overview of our conclusions.

Introduction

1.7 Guildford Borough Council undertook a Regulation 19 public consultation on their emerging Local Plan in June and July 2016.

1.8 It is understood that the Council received approximately 32,000 representations in response to this consultation period which the Council subsequently processed and published in February 2017.

1.9 Following this period of public consultation the Council has made a number of alterations to the Local Plan. Several of these are significant in nature. As a consequence of these amendments the Council is now undertaking an additional period of public consultation.

1.10 This additional Regulation 19 public consultation which commenced on 9th June 2017 is targeted in nature. As such all representations received in respect of the previous 2016 Regulation 19 consultation will still be submitted as part of the Local Plan examination.

1.11 However, in addition to this any representations received in relation to this additional Regulation 19 consultation will also be submitted to the Planning Inspectorate for consideration. This is provided that any additional representations relate to parts of the emerging Local Plan or evidence base which have been amended since the previous 2016 Regulation 19 consultation.

1.12 The following section of these representations therefore provides an overview of the key significant amendments made since the previous Regulation 19 public consultation in 2016. This will inform the matters which can be addressed as part of the targeted consultation currently being undertaken by the Council.

LAND AT POLESDEN LANE AND SEND MARSH
Green Belt Boundary Amendments

3.1 As set out in Section 2 of these representations one of the significant amendments made to the emerging Local Plan since the 2016 consultation is the revision of a number of Green Belt boundaries.

3.2 In a number of instances these revisions relate to the amendments made to site allocations within the Local Plan and reflect the alterations to the OAN proposed mainly as a result of the SHMA Addendum Report.

3.3 However, with regards to Land at Polesden Lane and Send Marsh Road the Green Belt boundary has been revised irrespective of any of these matters.

3.4 The proposed revision to the Green Belt boundary relating to Land at Polesden Lane and Send Marsh Road is illustrated in Amendment 6 of the ‘Send Marsh / Burnt Common’ policies maps.

3.5 The ‘Summary of key changes to the Proposed Submission Local Plan: Strategy and Sites (2017)’ notes that the reason for this amendment is to “ensure the Green Belt follows a defensible boundary”.

3.6 However as set out in Paragraph 85 of the NPPF when reviewing Green Belt boundaries local planning authorities “should not include land which it is unnecessary to keep permanently open”.

3.7 We have demonstrated in our previous representations that the removal of this site from the Green Belt would not have any adverse impact on the purpose or function of the Green Belt in this part of the Borough.

3.8 The Council have failed to address these representations and have failed to demonstrate any sufficient justification for retaining Land at Polesden Lane and Send Marsh Road within the Green Belt.

3.9 Our previous representations make reference to the Planning Advisory Service updated guidance on the preparation of Green Belt Assessments published in February 2015 titled, ‘Planning on the Doorstep: The Big Issues – Green Belt’. On the basis of both the five Green Belt purposes set out at paragraph 80 of the NPPF and the PAS guidance, a boundary should in no way inform or contribute to an assessment as to whether a land parcel meets the Green Belt purposes or otherwise.

3.10 An assessment of the contribution a land parcel makes to meeting the Green Belt purposes should firstly be carried out. Secondly and as necessary, subsequent consideration should be given to where any revised boundary should be located. The boundary assessment should in no way be confused with assessing the contribution a parcel of land makes to the Green Belt purposes.

3.11 Given the conclusions reached in our Green Belt Assessment and the evidence now presented by the Council regarding the boundary of the Green Belt, it appears that Guildford Borough Council has used the location of a boundary to inform their assessment of the site.

3.12 It is therefore considered that Guildford’s approach regarding the Green Belt boundary around our clients’ site has therefore not been justified, and is not consistent with national policy and is therefore not sound.

3.13 In light of the substantial requirement for housing delivery sites as established in Section 3 of these representations, we re-assert that this site should be removed from the Green Belt and be allocated for new residential development through the emerging Local Plan.

3.14 Paragraph 4.39 of the Housing Delivery Topic Paper supports this approach noting that “to not amend boundaries would lead to a significant undersupply of homes compared to the identified needs”.

3.15 The Council do acknowledge in their Housing Delivery Topic paper (Paragraph 4.85) that “if major previously developed sites are of sufficient scale and do not possess an open character, it is not considered necessary for them to remain within the Green Belt”.

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3.16 However, our previously submitted representations have demonstrated that the site is previously developed land and should therefore be removed from the Green Belt. The Council have nevertheless also failed to respond to these submissions.

3.17 With regards to Green Belt boundaries the NPPF requires local planning authorities to “satisfy themselves that Green Belt boundaries will not need to be altered” and should be defined “clearly, using physical features that are readily recognisable and likely to be permanent”.

3.18 Whilst it is acknowledged that not altering the Green Belt boundary in this location would ensure a defensible boundary the overall assessment of the site (as set out above) is not robust.

3.19 As clearly established by our Green Belt Assessment, the site makes at best, only a limited contribution to Green Belt purposes. As a subsequent and secondary point, the boundary issue would then be considered.

3.20 As we have previously highlighted a defensible boundary for the Green Belt can be established as a result of the removal of the site from the Green Belt owing to the existing site boundaries and substantial vegetation which would provide a clear and permanent boundary in compliance with the NPPF.

3.21 In light of the characteristics of the site and the Council’s recognition that there is a need for Green Belt release to meet the proposed housing target, we consider that in order for the plan to be found sound, the site should be removed from the Green Belt and allocated for new residential development through the emerging Local Plan.

**Flood Risk**

3.22 The Housing Delivery Topic Paper prepared as part of the 2017 public consultation into the Local Plan notes that “the Proposed Submission Local Plan has given due regard to national flood risk policy, and has not allocated land for housing development that does not accord with the flood risk compatibility table, or pass the sequential test”.

3.23 We have previously highlighted in our earlier representations that our client’s site has been incorrectly given a red ranking against flood risk in the site options appraisal. The Council have been provided with evidence to demonstrate that the site is not at risk of flooding and this ranking is therefore incorrect.

3.24 As illustrated in the flood risk map overlay provided in Appendix 2 and the location plans provided in Appendix 3 all of the proposed residential development can be provided on land which lies within the current Environment Agency Flood Zone 1. As such the site should score a green ranking against flooding and not a red ranking.

3.25 If this inconsistency is corrected then Land at Polesden Lane and Send Marsh Road performs strongly against the Council’s assessment criteria as set out in the sustainability appraisal.

3.26 Despite our representations the Sustainability Appraisal on the Guildford Borough Local Plan which was updated in June 2017 has not incorporated our comments.

3.27 In order to minimise any potential for legal challenge to the Local Plan process, we once again re-iterate that the sustainability appraisal should be revised to take into account the matters raised above and demonstrate how all of the reasonable alternatives have been considered. This is necessary to ensure the soundness of the Plan.

3.28 In addition Countryside has also commissioned a Fluvial Flood Study Report provided in Appendix 3.

3.29 This work addresses the fact that the Environment Agency had previously lacked suitable flood levels for the area in order to inform a Flood Risk Assessment for the site.

3.30 The Report provided in Appendix 3 incorporates hydraulic modelling of the watercourses within the vicinity of the site to determine flood levels and the resulting flood extents.

3.31 The results demonstrate that the site would be entirely situated out of any floodplain up to a 1 in 1000 year return period.
3.32 The site would therefore be entirely positioned within Flood Zone 1 subject to the Environment Agency approving the model.

4.1 These representations have been prepared in response to the Regulation 19 public consultation in respect of the ‘Guildford Borough Proposed Submission Local Plan: Strategy and Sites (2017)’.

4.2 The representations respond directly to the changes made between the 2016 and 2017 versions of the emerging Local Plan and in respect of the new and updated evidence base as required by the targeted consultation.

4.3 Our clients continue to support the commitment of the Council to progress their Local Plan however it is apparent that there are a number of outstanding issues which need to be addressed in order for the Local Plan to be found sound at examination. These points are summarised below.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 170724_Representations (1).pdf (6.9 MB)

Comment ID: pslp171/2623  Respondent: 15266785 / Trenfold Property Limited and Countryside Properties Limited
Agent: Boyer (Michelle Thomson)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Local Plan Policies
1.19 As a result of the new and updated evidence base set out above there have been a number of alterations made to the emerging policies set out within the Local Plan.

1.20 A full summary of all of the amendments are set out in the ‘Summary of key changes to the Proposed Submission Local Plan: strategy and sites (2017)’ document prepared by the Council.

1.21 However, generally these can be categorised as follows:
- Additional wording to reflect the NPPF, NPPG, or recent legislation;
- Additional or revised wording to provide clarification or further explanation of a policy’s intent;
- Additional or revised wording to reflect the consultation responses of statutory consultees (e.g. Environment Agency, Historic England, Natural England);
- Amendment to reflect an alteration proposed to a site allocation, Green Belt boundary or settlement boundary;
- Amendment to reflect or make reference to new or updated evidence;
- Deletion of text considered superfluous or unnecessary;
Representations in response to the Guildford Borough Proposed Submission Local Plan | Land at Polesden Lane and Send Marsh Road
- Correction of typographical errors.

1.22 Of the amendments made to the Local Plan the most significant are the alteration to the proposed plan period which is now 2015

1.23 The 2017 version of the Local Plan now seeks to deliver only 12,426 additional homes rather than 13,860 homes as proposed in the 2016 version of the Local Plan (a reduction of 1,434 homes).
1.24 This is reflected in draft Policy S2 which has now also been revised to illustrate a revised annual housing target. A summary of the proposed amendments to the annual housing target are set out in the table below.

1.25 It should be noted that as a result of the proposed plan period between the 2016 and 2017 versions of the Local Plan being revised there is no annual housing target for 2033/34 in the 2016 version or 2018/19 in the 2017 version.

1.26 This is because the plan period ended in 2033 in the 2016 version and the 2017 version of the plan is not anticipated to be adopted until 2019. As such, Guildford Borough Council is taking the approach that, the annual housing target does not commence until 2019/2020 following the proposed adoption of the plan.

[Table]

1.27 The differences between the total amount of housing proposed to be delivered between the 2016 and 2017 versions of the plans are explained below.

1.28 It can be seen that in the first five years following the adoption of the Local Plan (2019 – 2024) 750 fewer homes are proposed to be delivered as part of the 2017 version of the Local Plan.

1.29 The annual housing target in emerging Policy S2 does not total the number of dwellings proposed to be delivered overall by the spatial vision in either the 2016 or 2017 version of the Local Plan.

1.30 This is owing to the fact that the annual housing target does not relate to the entire Plan period. In the 2017 version of the Local Plan for example the overall housing target is 12,426 however the annual housing target numbers only equal 9,810. This is as a result of the Plan period for the 2017 version of the Local Plan being 2015 – 2034 but the annual housing target only commencing in 2019/2020.

1.31 The 2,616 difference between the overall housing target of 12,426 and the total of the annual housing target (9,810) therefore relates to the pre-adoption period of 2015 – 2019. This is demonstrated in the Housing Trajectory set out in the 2017 LAA Addendum. A summary of this is provided in the table below.

[Table]

1.32 The new OAN figure of 654 as proposed in the SHMA Addendum and 2017 version of the Local Plan is therefore utilised across these four years as the annual target. This however results in a projected backlog of 974 houses prior to the adoption of the emerging Local Plan owing to poor housing delivery rates.

Site Allocations

1.33 The 2017 version of the emerging Local Plan makes a number of significant amendments to the site allocations previously set out in the 2016 version of the Local Plan. These amendments include the removal of six site allocations and the insertion of two new site allocations.

1.34 Specific details of the amendments made to each site allocation can be found in the ‘Summary of key changes to the Proposed Submission Local Plan: strategy and sites (2017)’ published by the Council.

1.35 However, several of the amendments relate to the capacity or proposed uses associated with site allocations identified in the 2016 version of the emerging Local Plan.

1.36 This includes an additional 550 homes being proposed at site allocation A29 (Land to the south and east of Ash and Tongham) and the removal of the industrial element from site allocation A43 (which has been re-located to new site allocation A58).

Policies Maps

1.37 As part of the Regulation 19 public consultation in 2016 approximately 40 policies maps were published to spatially illustrate the proposed planning policies and site allocations set out in the emerging Local Plan.
1.38 In light of the amendments made to the evidence base, strategic policies and site allocations in the 2017 version of the emerging Local Plan which have been set out above more than one third of the policies maps in Appendix H have been subject to amendment.

1.39 The extent of amendments proposed to each map varies considerably however, the alterations can be generally categorised as follows:

- Correction of an identified error in the previous policies maps;
- Removal or amendment to a site allocation or new designation of a site;
- Green Belt boundary amendments; or
- Amendments to a settlement boundary.

1.40 Specific details of the amendments made to each policy map can be found in the ‘Summary of key changes to the Proposed Submission Local Plan: strategy and sites (2017)’ published by the Council.

1.41 With regards to the Green Belt boundary amendment at Land at Polesden Lane and Send Marsh Road the alteration proposed would in effect revert to the existing Green Belt boundary.

1.42 As such the revisions to the Green Belt boundary originally proposed under the Regulation 19 consultation held in 2016 are no longer intended to be incorporated.

1.43 Under the current proposals as set out in the policies maps which accompany the targeted Regulation 19 consultation Land at Polesden Lane and Send Marsh Road would therefore not be removed from the Green Belt.

4.4 As set out in Section 2 of this report one of the most significant influences on the 2017 version of the emerging Local Plan has been the addition of the ‘West Surrey Strategic Housing Market Assessment (SHMA): Guildford Addendum Report 2017’ to the evidence base.

4.5 As a result of this Addendum Report the Objectively Assessed Need (OAN) for Guildford has been revised from 693 homes per year to 654 homes per year.

4.6 However, the Addendum Report demonstrates that there is a clear and increasing need for housing within the Borough. Indeed the demographic and affordability findings of the Addendum Report do not support the proposed reduction in OAN incorporated into the 2017 version of the emerging Local Plan.

4.7 We do not therefore support the lower OAN figure utilised in the 2017 Proposed Submission version of the Local Plan. This amendment to the Local Plan is therefore considered to be unjustified.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 170724 Representations.pdf (6.9 MB)

2.14 As set out in paragraph 182 of the NPPF Local Planning Authorities are required to demonstrate that they have positively prepared their Local Plan. This should include seeking to meet “unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development”.

2.15 Paragraph 181 of the NPPF also notes that Local Planning Authorities “will be expected to demonstrate evidence of having effectively cooperated to plan for issues with crossboundary impacts”.

2.16 Furthermore, they must also be “sure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area”.

2.17 Paragraph 4.36 of the Duty to Co-operate Topic Paper prepared by the Council notes that Guildford Borough Council alongside Woking and Waverley Council have jointly signed up to a Memorandum of Understanding (MoU). “This includes an agreement to prepare an up-to-date joint SHMA together with a commitment to review whether this needed updating every three years”. In addition the MoU also included a “commitment to continuing to work jointly on other relevant cross boundary matters”.

2.18 The decision of Guildford Borough Council to prepare an Addendum to the joint West Surrey SHMA (2015) is clearly contrary to the MoU and the commitment to “work jointly”. The Addendum Report prepared by Guildford fails to take into account the wider HMA within which both Woking and Waverley Council lie.

2.19 It is clearly apparent from the nature of the Addendum Report prepared that Guildford Borough Council has therefore failed to meet the requirements of paragraph 47 of the NPPF. In that they have failed to consider the wider housing market area (HMA). The Addendum Report is therefore not considered to be consistent with national policy. 2.20 Accordingly, Guildford Borough Council cannot be considered to have demonstrated that they have worked effectively or collaboratively with their neighbouring authorities.

4.8 As also outlined in Section 3 of these representations Guildford Borough Council have a duty to co-operate and must be able to demonstrate this as part of the independent examination of their Local Plan.

4.9 Woking Borough Council lies within the same HMA as Guildford Borough Council and has a significant unmet need. In spite of this Guildford Borough Council are currently proposing to assist Woking with none of this unmet need.

4.10 The ‘Guildford Borough Proposed Submission Local Plan: Strategy and Sites (2017)’ therefore does not currently satisfactorily demonstrate that it has been prepared in a positive manner. The Council should seek to address this matter before the emerging Local Plan proceeds to Examination.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 170724 Representations.pdf (6.9 MB)
Policy S2 - Planning for the Borough - Our Spatial Development Strategy

The spatial strategy rests heavily on a small number of strategic sites to deliver the longer term housing supply over 6-10 and 11-15 years. However, if there is a delay in delivering these strategic sites, or they prove not to be viable, then the supply of housing will be significantly interrupted. Smaller sites should be identified near to the large strategic sites to improve delivery and avoid under-supply.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/416  Respondent: 15266977 / Gordon Phillips  Agent: Neonova Design (Mark Brett-Warburton)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

We consider the current spatial distribution of housing is over-reliant on major strategic sites and that some additional smaller sites in the locations identified would improve delivery and avoid under-supply in the event that the strategic sites do not come forward on time, or, are proved to be not viable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/417  Respondent: 15266977 / Gordon Phillips  Agent: Neonova Design (Mark Brett-Warburton)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

We believe a site for residential development should be located at North Wyke Farm, Guildford Road, Normandy, Surrey, GU3 2AN. This site could include some provision for retail units as part of a mixed uses scheme that would benefit the local community.

The site was included in the GBC SHLAA in December 2012, but subsequently excluded from
later proposals. However, GBC has now included a site for 1,100 residential units on the opposite side of the road, which provides confirmation that the location of the North Wyke Farm site is appropriate for residential development.

We would like the opportunity to present suitable evidence at the examination to support the inclusion of North Wyke Farm as a residential or mixed uses site within the Guildford Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPA16/700  **Respondent:** 15267425 / Amanda Cowan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Guildford Urban Area

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to the 2016 Draft Local Plan. Burpham already struggles with traffic issues on a normal day and by increasing the number of houses and cars, the area won't be able to cope. Also the local schools are over subscribed at the moment so will new schools be built or increased in size to accommodate the increased children. What is the point of a green belt if not to protect the environment and wildlife if you build on it and destroy it. The green areas are what make Guildford so attractive. Also burpham has no south access to the A3 so there will be even more traffic trying to get through. Let's keep Guildford it own town and not merge it with all the surrounding ones.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPA16/701  **Respondent:** 15267521 / Land Owner of Hornhatch Farm  **Agent:** Scott Brownrigg Planning (Natalie Walter)

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Subject: Proposed Submission Local Plan Consultation (June 2016)

I write on behalf of our client in relation to “Guildford Borough Proposed Submission Local Plan: Strategy and Sites,” published for consultation on 6th June 2016. Our client is the landowner of “Land at Hornhatch Farm, Chilworth.”

Background

The site known as “Land at Hornhatch Farm, Chilworth” was proposed for removal from the Green Belt and allocation as a potential development site in the “Draft Guildford Borough Local Plan: Strategy and Sites” (July 2014) [site allocation no. 68]. This was following consideration of the contribution of the site to the main purposes of the Green Belt; its location adjoining an inset settlement; the need for defensible boundaries; and deliverability considerations.

This potential development site has since been removed in the “Guildford Borough Proposed Submission Local Plan” (June 2016) [“the proposed submission local plan”].

Case for Retention in Forthcoming Local Plan

Our client objects to the removal of former site allocation 68 from the proposed submission local plan for the reasons set out below.

Need for Housing

Guildford Borough is currently not meeting its’ housing requirements. The 2014-15 Annual Monitoring Report sets out on page 9 that Guildford had a 1.4-year supply of housing. It further states on page 11:

“We are not currently able to demonstrate a five year supply of deliverable housing land without amendments to Green Belt boundaries and use of countryside land (against objectively assessed housing need of 693 homes a year).”

This is again acknowledged in paragraph 4 of the decision letter for appeal reference APP/Y3615/W/15/3132375, which states:

“The Council indicate that it cannot demonstrate a five year supply of housing land.”

West Surrey Strategic Housing Market Assessment (2015) identifies that there is a need for a mix of house sizes across the housing market area as identified in Table 8.

In respect of the strategy put forward in the proposed submission local plan to deliver housing, the Council are placing undue reliance on Policy A35: “Land at former Wisley airfield, Ockham.” This site is proposed for allocation for the delivery of 2,000 homes. This one site is proposed to contribute up to 14% of the housing required over the plan period.

Our client considers that significant uncertainties exist in respect of the delivery of the Wisley airfield site and that this strategy is therefore unsound.

In addition, a planning application for the site proposed in Policy A7: “Land and buildings at Guildford railway station, Guildford” (planning application reference: 14/P/02168) was refused on 30th June 2016. This potential allocation includes redevelopment for approximately 350 homes. Our client considers that uncertainty exists over the delivery of this and other potential previously-developed sites thereby meaning the proposed number of homes to be delivered in the plan as set out in Policy S2 is unlikely to be met.

Further consideration should therefore be given to the delivery of smaller, sustainable sites, such as “Land at Hornhatch Farm.”

Lack of Justification for Removal of Site
“Land at Hornhatch Farm” was included as a potential development site in the “Draft Guildford Borough Local Plan: Strategy and Sites” (July 2014). The reasons given for its omission from the proposed submission local plan are:

“Our spatial strategy and site allocations have been considered through the Sustainability Appraisal and this site no longer accords with the proposed spatial strategy in the Local Plan. The site was identified in the Green Belt and Countryside Study but is located within high sensitivity Green Belt.”

Our client considers that the justification for the site’s exclusion is based on subjective qualitative methodology used to assess the Green Belt, which has only been published for consultation at a late stage in the plan-making process. The forthcoming plan has therefore not been prepared in the light of a robust evidence base.

Sustainability

Allocation of “Land at Hornhatch Farm” would form a sustainable extension to Chilworth. The site was previously assessed in the 2014 “Draft Guildford Borough Local Plan: Strategy and Sites” as suitable for residential development within one to five years. The site is located in Environment Agency Flood Zone 1 (low risk of fluvial flooding) and is within 5 to 7km of the Thames Basin Heaths Special Protection Area (SPA) and therefore is beyond the zone of influence of this SPA.

Green Belt Considerations

Paragraph 89 of the National Planning Policy Framework (NPPF) states that local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. It also sets out that authorities should consider Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.

Our client considers that there is a clear case for removal of the site from the Green Belt and its retention as a site allocation for residential development. The site would have clearly defined boundaries as required by paragraph 85 of the NPPF. Our client notes that additions to the Green Belt are proposed to be made elsewhere in Guildford Borough. This approach is supported.

Deliverability

The site is within single ownership, is available now and development would be achievable in the short to medium term.

Conclusions

Land known as “Land at Hornhatch Farm” should be retained as an allocation for residential development in the Guildford Borough Submission Local Plan: Strategy and Sites.

Guildford Borough is not currently meeting housing delivery requirements and the strategy put forward in Policy S2 is unsound due to an overreliance on particular site allocations, such as Policy A35: “Land at former Wisley airfield, Ockham.”

A lack of justification has been provided for the removal of “Land at Hornhatch Farm” from the spatial strategy and there has been a lack of proper consultation on the “Green Belt Sensitivity Map.”

Allocation of the site for residential use would have the benefit of bringing forward a deliverable sustainable extension to Chilworth that would contribute to providing much-need housing in Guildford Borough.

I trust that this letter is clear but please do not hesitate to contact me if you have any questions or queries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPS16/1096  
Respondent: 15267521 / Land Owner of Hornhatch Farm  
Agent: Scott Brownrigg Planning (Natalie Walter)

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

The table should include an additional allocation: “Land at Hornhatch Farm.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2153  
Respondent: 15267521 / Land Owner of Hornhatch Farm  
Agent: Scott Brownrigg Planning (Natalie Walter)

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

Object to proposed Green Belt boundary showing retention of “Land at Hornhatch Farm” as a Green Belt designation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2152  
Respondent: 15267521 / Land Owner of Hornhatch Farm  
Agent: Scott Brownrigg Planning (Natalie Walter)

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The strategy put forward is unsound due to over-reliance on “Land at former Wisley airfield, Ockham.” Please refer to letter dated 8th July 2016 for further detail.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/418</th>
<th>Respondent: 15267521 / Land Owner of Hornhatch Farm</th>
<th>Agent: Scott Brownrigg Planning (Natalie Walter)</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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</table>
Comment ID: SQLP16/420  Respondent: 15267521 / Land Owner of Hornhatch Farm  Agent: Scott Brownrigg Planning (Natalie Walter)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Please refer to letter dated 8th July 2016.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/421  Respondent: 15267521 / Land Owner of Hornhatch Farm  Agent: Scott Brownrigg Planning (Natalie Walter)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Object to retention of “Land at Hornhatch Farm” as a Green Belt designation.

“Land at Hornhatch Farm” should be removed from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2154  Respondent: 15267649 / The Northumberland Estates (Guy Munden)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy H2 requires affordable housing to be provided on sites providing five or more dwellings. This is considered to be contrary to national planning policy guidance issued by the government. In 2014 the Secretary of State for Communities and Local Government announced that there would not be a requirement to provide a contribution to affordable housing for development of 10 dwellings or fewer. This announcement was subject to judicial review, however in May 2016 a Court of Appeal judgement restored the policy which means that affordable housing cannot be sought on sites of 10 or fewer dwellings. It is considered that Policy H2 should be updated to reflect the Court of Appeal judgement and the latest government guidance.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPA16/703  | Respondent: | 15267713 / Roger Black  | Agent: |
|-------------|--------------|-------------|-------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Shalford (south) |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I'm writing to object to the above proposal on many grounds but especially my concern for the safety of all local residents if chinthurst Lane is to become more dangerous due to increased traffic as it is treacherous already.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPA16/708  | Respondent: | 15268545 / Ivan Gale  | Agent: |
|-------------|--------------|-------------|-------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
4) I object to the SHMA housing figures – they are too high, they are not local housing need but greed of landowners, developers and Guildford Council.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2158  Respondent: 15268545 / Ivan Gale  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to lack of protection for heritage and environmental assets, particularly wildlife diversity, loss of habitat and our green and pleasant county.
2. I object to the obsession with economic growth over quality of life which will blight the areas proposed for development, again this is greed not need.
3. I object to the impact these developments will have on neighbouring areas such as Pyrford, which has not been taken into account/Ivan and Carole/.
4. I object to the full-scale abuse of Surrey’s peace and beauty.
5. I object to the Conservative Council who said they would protect Green Belt, but they lied.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2157  Respondent: 15268545 / Ivan Gale  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1) I object to any development on green belt land.
2) I object to removal of any villages from the green belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/425  Respondent: 15268545 / Ivan Gale  Agent:
3) I object to the limited time for consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Access to essential facilities – NO MENTION IN WRITTEN POLICIES.

Vague statements within Infrastructure Polices section.

The small grocery store at the southern end of the village may close later this year as the shop owner is retiring. There are no plans to keep this in place and will go the way of the Post Office we lost from there next door recently.

Even if commercial outlets such as these would remain, there has always been very limited parking outside this store and such congestion as there has been in the past would get far worse.

People using East Horsley’s shops and Public Library in 2016 experience more and more difficulty in parking their cars at most times of the day. The proposed large increase in population of West and East Horsley will make parking and movement into and through the village considerably more difficult and time consuming.

Schools – the word ‘schools’ is mentioned in Definitions under Policy I1 Infrastructure and Delivery.

There is a continuing lack of state primary school places in the village. The Raleigh school which serves both East and West Horsley is full every year and this has been the situation for many years. Secondary school places are limited in number at the Howard of Effingham School and other secondary schools involve a much longer journey of time and distance from the village to reach them. This alone is not environmentally acceptable, especially in the current climate where we are encouraged to be more “green”.

Glenesk and Cranmore private schools are well supported by many families living in Guildford and other villages up to 14 miles away. Each of these private schools during term time, receives high volumes of traffic going to and from each school at each end of the school day, on Ockham Road North and the A246 respectively.

Medical facilities – possible extension to Kingston Avenue Medical Centre mentioned in Infrastructure Delivery Plan (IDP)
Kingston Avenue Medical Centre, serving all of East and West Horsley and areas beyond, is always extremely busy and residents experience difficulty in making appointments. The planned population increase (in excess of Government ONS forecasts) for the Borough will require a major extension of the Royal Surrey Hospital to cope.

Roads and Transport Infrastructure – these words are mentioned in Definitions under Policy I1 Infrastructure and Delivery.

No detail for West Horsley has been found in any of the Local Plan documents, including the Infrastructure Delivery Plan.

Whilst Horsley station has frequent trains to London and Guildford 7 days a week, the station car park is normally full on weekdays. An increase in village population will increase pressure on station parking and traffic movements to / from Horsley station to drop off/ collect travellers to London and school children going to Guildford and Leatherhead.

Traffic generation from the proposed new housing estates will be considerable. Most households in rural areas as a necessity have 2 cars, many having 3. Journey times on local roads will increase significantly.

Finally:

Waste water Infrastructure – these words receive a mention in Reasoned Justification under Policy I1.

No detail for West Horsley has been found in any of the Local Plan documents, including the Infrastructure Delivery Plan.

There are known sewage overflow problems in the Ockham Road North / Green Lane area. Thames Water has advised Guildford Borough that the area’s wastewater network is unlikely to be able to support the demand anticipated from all the proposed developments.

The foul drainage system from West Horsley to the treatment works north of Ripley, will need to be upgraded to cope. Thames Water advise a 2 to 3 years lead-in period to install the necessary waste water network and treatment capacity after planning permission for a development is granted.

It is blatantly obvious that the proposed development on the scale suggested is unreasonable, impractical and unacceptable to all that will be affected – directly through the villages and further afield.

I ask that the appropriate and responsible authorities seek all opportunities to developing brown field sites – through the Guildford Borough Council area, before even considering such drastic and environmentally damaging options which seem to have been ill-thought out.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID:</th>
<th>PSLPP16/2161</th>
<th>Respondent:</th>
<th>15268641</th>
<th>Sandy Homewood</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
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Policy i3: Sustainable Transport for new developments.

Developers will be expected to propose and secure travel Plans for their developments and contribute to transport arrangements for the able and disabled.

I can’t think of a single developer who would get even remotely close to achieving this, when it will be at odds with their profit potential. Development history has taught us that scant regards is taken for the community when it comes to development and profit making.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2159  Respondent: 15268641 / Sandy Homewood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to register objections to the Draft Local Plan on the following:

Proposed Submission Local Plan: Strategies and Sites June 2016, with regards to the proposed development in East and West Horsley as follows:

Policy P2: Green Belt and the Countryside / Policy P1: Surrey Hills Area of Outstanding Natural Beauty (AONB)

I and many if not the majority of residents of West Horsley are totally opposed to the village's removal from the Green Belt by insetting and extending the 2003 Local Plan Settlement Area boundaries.

There are no exceptional circumstances or other justification is made for the new Green Belt boundaries that will result from the proposed insetting of the two parts of the village from the Metropolitan Green Belt.

West Horsley's defined Settlement Area boundaries (ref 2003 Local Plan) DO NOT need to be extended. West Horsley Parish is one of a rich and varied mix of well-established low housing density settlements with a considerable number of historic buildings. Positioned on the north side of the North Downs, partly in the Surrey Hills AONB, it attracts a considerable number of recreational visitors. Evidence of this is specific with walkers and cyclists, reliving the 2012 Olympic Cycle race and subsequent annual races which is now a feature through this and other local villages.

The Key Evidence document 'Guildford Borough Economic Strategy 2013-2031 makes no case for locating large numbers of homes in West and East Horsley or neighbouring villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2160  Respondent: 15268641 / Sandy Homewood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policies S1 Presumption in favour of Sustainable Development, S2 Borough Wide Strategy, H1 Homes for all, H2 Affordable Homes.

Policy S2 states that provision will be made for 13,800 new homes over the Plan Period 2013 to 2033. The number of homes is too high and unsustainable in Guildford’s villages.

The Site Allocations list totals 12,698. Village expansion is unsustainable. With only one small shop, no post office, a very limited weekday only bus service through the village, it is clearly unsustainable for the proposed high volumes of new housing development.

The development of 385 homes on the 4 proposed sites are at much higher densities than currently exist in the village settlement and will be totally out of character with the existing mix of different housing styles and layout of the village. The homes building proposals are unsustainable in terms of schooling, drainage, roads capacity, shops, parking in East Horsley (shops and station) and public transport.

The need for so many houses to be built in West Horsley over the first 5 years of the Plan period 2018 to 2033 is totally unproven. The West Horsley Parish Council and Surrey Community Action Housing Survey: May 2014, identified a limited need for some 20 affordable homes for local people who want to remain in the village, i.e. for young people and for elderly people who wish downsize to a smaller home.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1112  Respondent: 15269505 / James Adkins  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( No ), is Legally Compliant? ( Yes )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of green belt planning restrictions on the land proposed for development in Normandy (A46) as most of the key criteria for green belt status apply to this area.

I object to the proposals to add 1100 new homes and a new school in the Normandy area as the road network in Normandy and the surrounding areas (where I live) will not be able to sustain the volume of traffic that this housing development plus additional school journeys will bring. There are no highway improvements that can conceivably be made to these country lanes that would convert them to the A-class roads needed to serve the proposed development and additional traffic going to the school. The traffic pressures on Glaziers Lane, Westwood lane, Wanborough Hill, the B3000 and the A31 have built up tremendously over the last few years and there are frequent long queues on Wanborough Hill and the B3000 during rush hour periods and it also now happening at other times during the working day. The roads in this area are not adequate to cope with current traffic volumes now, let alone the impacts of proposed significant additional developments at Normandy (A46), Ash & Tongham (A29) and Ash Green plus others just downstream off the A3 at Blackwell Farm (A26) and...
Onslow Village A11, A15 & A16) which would also influence traffic knock on impacts. I retired in 2010 and could leave and return to our house in Wanborough at any time of day without encountering significant queues apart from during well defined short rush hours whereas now I regularly have to queue on Wanborough Hill and the B3000 at almost any time of day.

I believe the West Surrey Housing SHMA used by Guildford Borough Council as a fundamental rationale for the removal of Green Belt status from Normandy, Flexford and various other local areas now proposed for development was significantly overestimated and has not been subjected to sufficient rigorous checks about its accuracy.

In addition events have now moved on and the current consensus of independent economic forecasters is that the short to medium term UK's (and hence South East's) growth forecast has significantly reduced from previous forecasts due to the likely impacts of Brexit uncertainties on the economy. These reductions of likely growth trends as well as probable changes to population movements have not been factored into the local planning process yet and both these factors are likely to reduce some of the demand for additional new housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** SQLP16/429  **Respondent:** 15269505 / James Adkins  **Agent:**

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document: complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

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I believe the West Surrey Housing SHMA used by Guildford Borough Council as a fundamental rationale for the removal of Green Belt status from Normandy, Flexford and various other local areas now proposed for development was significantly overestimated and has not been subjected to sufficient rigorous checks about its accuracy.

In addition events have now moved on and the current consensus of independent economic forecasters is that the short to medium term UK's (and hence South East's) growth forecast has significantly reduced from previous forecasts due to the likely impacts of Brexit uncertainties on the economy. These reductions of likely growth trends as well as probable changes to population movements have not been factored into the local planning process yet and both these factors are likely to reduce some of the demand for additional new housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** SQLP16/430  **Respondent:** 15269505 / James Adkins  **Agent:**

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?
I object to the removal of green belt planning restrictions on the land proposed for development in several areas as most of the key criteria for green belt status still apply for those areas. Green belt status and in the case of Blackwell Farm AONB status were envisaged to protect these areas for all future generations to experience and enjoy the rural spaces.

I object to the proposals to add significant new housing developments in existing rural green belt areas in the light of an already chaotic road transport network within the A3 / A31 corridor areas without any obvious solutions being on the horizon to relieve congested roads already unable to cope at times with current volumes of traffic let alone additional volume impacts from further significant new housing developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
It is noted that a Memorandum of Understanding is to be prepared between the three authorities with the aim that OAHN is met across the HMA. However it is unclear how this will guarantee that every effort is made to address OAHN in full.

Hart District Council therefore suggests that some flexibility is needed in the Guildford Plan to address this uncertainty and ensure that OAHN across the HMA is met. This flexibility could be in the form of a Review Clause inserted into the Plan which would be triggered in the event that between them, Woking and Waverley do not address their OAHNs in full.

We anticipate making a similar representation to Waverley Borough Council assuming they publish their Regulation 19 Plan meeting only their housing needs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/716  Respondent: 15270401 / Lynne and Nick Martin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Housing Numbers

The housing numbers proposed are too high. It does not take any account of the constraints that apply locally. It is based on a Strategic Housing Market Assessment (SHMA) which the full council required to be amended by the then Lead Councilor for Planning and the Head of Planning. No amendment has taken place; those individuals are no longer in their posts. A new, revised, SHMA on a joint basis with Woking and Waverley has not yet been published and is not part of the evidence base. How can anyone comment on the proposed plan when the fundamental housing number is still so uncertain?

1. Brownfield Sites are Available

There is brownfield land available in the town centre which is being earmarked for commercial development rather than for housing. This is enough to meet our real needs for affordable local homes. There are enough vacant commercial sites to cope with genuine business need, and we have enough retail capacity already, so urban brownfield/derelict land should be used for housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/719  Respondent: 15270401 / Lynne and Nick Martin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
2. Housing Numbers

The housing numbers proposed are too high. It does not take any account of the constraints that apply locally. It is based on a Strategic Housing Market Assessment (SHMA) which the full council required to be amended by the then Lead Councilor for Planning and the Head of Planning. No amendment has taken place; those individuals are no longer in their posts. A new, revised, SHMA on a joint basis with Woking and Waverley has not yet been published and is not part of the evidence base. How can anyone comment on the proposed plan when the fundamental housing number is still so uncertain?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/720  Respondent: 15270401 / Lynne and Nick Martin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Flaws in the Draft Local Plan

A number of flaws and omissions are evident in the draft LP.

- No joint SHMA with neighbouring boroughs has been produced, as required
- There is no Strategic Environmental Assessment included, as required
- No sustainability assessment is presented for any of the sites
- No infrastructure document is present
- The evidence base is shot through with many factual and calculation errors
- A number of assumptions used in the evidence base are unsupported by evidence
- The results of calculations are included, without the underlying workings provided
- Settlement boundaries have been arbitrarily extended, without any meaningful explanation

Our road leads to the area around the site off Green Lane in West Horsley which is at risk of development per your plan and this area is a major flood risk, with raw sewage pouring into the roads, on the occasion of the last major flood at Christmas 2013. We are very concerned and object to this area being developed.

In conclusion, I ask GBC to revise the housing number, and to amend the Local Plan to utilise brownfield/previously used land rather than green field sites – of which there are significant amounts of the former within the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
4. Flood Risk & Congestion

Our drains, our water supply, our medical facilities, state primary school, and our roads cannot cope with the proposed number of new homes. Building this number of homes will lead to flood risk here and downstream (along the Wey and Thames). The planned development on Green Belt is therefore unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

We wish to register objections to the Draft Local Plan. Our reasons are as follows:

1. Green Belt

Our Green Belt is precious. It is what protects London from urban sprawl; it preserves air quality; it prevents flooding; it is the city’s playground. It is for us to conserve and protect it. There are 5 legal purposes for Green Belt, and it meets them all:

- To check the unrestricted sprawl of large built up areas
- To prevent neighbouring towns merging into one another
- To assist in safeguarding the countryside from encroachment
- To preserve the setting and special character of historic towns
- To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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- To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2288  Respondent: 15270401 / Lynne and Nick Martin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Brownfield Sites are Available

There is brownfield land available in the town centre which is being earmarked for commercial development rather than for housing. This is enough to meet our real needs for affordable local homes. There are enough vacant commercial sites to cope with genuine business need, and we have enough retail capacity already, so urban brownfield/derelict land should be used for housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/434  Respondent: 15270529 / Elizabeth Heffernan-McClelland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
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<tr>
<th>Comment ID:</th>
<th>PSLPS16/1188</th>
<th>Respondent:</th>
<th>15270593 / Paton Development (N Paton)</th>
<th>Agent:</th>
<th>planit consulting (janet long)</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A46</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

I object strongly to having A44 I don't need 2 traveller sites at the bottom of my garden.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPS16/1240</th>
<th>Respondent:</th>
<th>15270593 / Paton Development (N Paton)</th>
<th>Agent:</th>
<th>planit consulting (janet long)</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

see comment in box below.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [Site objection – Glaziers Lane.docx](157 KB)

<table>
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<tr>
<th>Comment ID:</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

please see attached statement

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [Site objection – Glaziers Lane (Strawberry Farm).docx](157 KB)
I am writing with my comments on the draft Local Plan for Guildford under Regulation 19. These mainly concern Policy P2 and Effingham where I live.

I very much support the main thrust of the plan and, in particular, support the concept of “insetting”. I believe that a limited amount of new build is desirable but that this should not be to the detriment of the Green Belt. I understand that according to the NPPF, that where boundaries are changed in the Green Belt, they should not include land which it is necessary to keep permanently open and should be defined using physical features that are readily recognisable and likely to be permanent.

I was therefore rather baffled to find that Manor House Lane had been excluded from “insetting” in the latest plan. My understanding is that it had been recommended for inclusion for insetting in the Green Belt and Countryside Study, 2014 and in the EAB Draft. The reasons I think that it should be included are:

? “Insetting” should be designed to protect the Green Belt from development spreading into it, but it should include as much of the village’s centre as possible so that it defines a small, continuous residential area.

? Manor House Lane is very much a part of the perceived settlement area of the village of Effingham as noted in the Green Belt and Countryside Study, 2014. To be excluded suggests we are a peripheral group of houses outside the village, which is not the case, as we are a continuous part of the village perceived settlement area from Guildford Road/A246.

? The more logical boundary for “insetting” would be to include Manor House Lane as it is a clear continuation of the settlement on Guildford Road with no natural permanent boundary separating it from it. The houses in Manor House Lane have clear physical boundaries on the other three sides. It is defined by rows of mature trees on two sides (one to the west bordering King George V and one to the south bordering Manor House School) and by the road with a row of mature trees on the eastern side to Little Bookham. These are clear boundaries of physical features that are readily recognisable and likely to be permanent as required under the NPPF and noted in the Green Belt and Countryside Study.

? Manor House Lane seems to have been excluded from the proposed inset area when it was decided to exclude the King George V playing fields. These are well used, and enjoyed playing fields, which it is sensible to exclude from the inset area although they are protected from development by the trust establishing them. However, this should not exclude Manor House Lane from being inset as it has its own separate, physical boundaries as noted above and thus does not affect the openness of the Green Belt around it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I support Policy P2 on insetting but do not agree with the proposed boundaries for Effingham - see below where I think the boundary is incorrect and have suggested an alternative.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/531  Respondent: 15270753 / Robert & Judy Hatfield  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We wish to respond to Guildford Borough Council’s consultation on changes to the Local Plan.

We would like to support the removal of site A46 (1100 homes and school) on land to the south of Normandy and north of Flexford, and the removal of site A47 (50 homes to the east of the Paddocks, Flexford). If these ever went ahead, there would be total overload on:

- Roads - extra traffic
- Waste water - drainage would not be able to cope, causing flooding - which has already happened in the past many times
- Electricity
- Health care would also be drastically overloaded

This area is Green Belt, which should not be tampered with.

We want to strongly object to the removal from the Green Belt of certain homes in Guildford Road, Glazier’s Lane, Flexford, Walden Cottages, Palm House Nursery, and Whittles Drive traveller sites.

If the Green Belt status was removed, development may progress at a much higher rate. These areas contribute to keeping the Green Belt areas more open and beautiful.

Although we do not agree with all the extra homes proposed in a 10-mile radius of Normandy, if these do go ahead, then Guildford Borough Council should plan ahead and ensure that suitable changes are made to the infrastructure: for instance a road bridge and footbridge should definitely be built at Ash Station (LRN21) as traffic jams are already a frequent occurrence.

We would like all these points we have made to be taken into consideration, and acted upon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/2199</th>
<th>Respondent: 15271841 / Carolyn Ramage</th>
<th>Agent:</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</td>
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I agree that the Local Plan should focus on providing more affordable accommodation in Guildford and at least 40% of new build should be affordable. I think limited use of greenfield/green belt land is justified for the provision of affordable housing, and the sites proposed look reasonable.

I think that people who want to work in Guildford, e.g. At the hospital, should be able to afford to live in Guildford. I worry that increasing house prices will mean more commuters and less community. I also worry that it will lead to an even older population profile, and reduce the incentives for young talent to start or stay here.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
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<tr>
<th>Comment ID: pslp172/365</th>
<th>Respondent: 15271841 / Carolyn Ramage</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
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<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong></td>
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We have been receiving flyers from the save the hogs back campaign encouraging us to object to the local plan, but no obvious way of showing our support for the plan. We agree that increasing affordable housing in Guildford is a priority and will benefit the whole community. If necessary, this might mean having to relax the protection of some of the beautiful land around Guildford. Whilst we value, love and enjoy the green areas around Guildford and think that planning has an important role in maintaining this, we understand there is a balance between this and the housing needs of the local population and think the plan strikes the balance well.

We agree with the reduction of the site size threshold and increase in the % of affordable housing required, and strongly agree with the removal of the "subject to viability" clause for developers.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/1136</th>
<th>Respondent: 15271969 / Denise Humphriss</th>
<th>Agent:</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A44</td>
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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy A44 in Send Hill on the basis that: There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

I object to policy A44 in Send Hill on the basis that: The proposed development is not sustainable because of poor infrastructure. Send Hill is a single track country road and too narrow to provide sufficient access to the site for travellers or accommodate the potential new levels of traffic the proposed development would bring.

I object to policy A44 in Send Hill on the basis that: A Wasteland Solutions environmental report on Send Hill dated March 2004 gave evidence of past ponding of water in the excavated area. Further development would disturb the water table and increase risk of flooding to surrounding properties.

I object to policy A44 in Send Hill on the basis that: The site was used as a GBC registered landfill site and shown on the 1963-8 Ordnance Survey maps as “refuse and slag heap”. It is therefore unsuitable for such a development on health reasons.

I object to policy A44 in Send Hill on the basis that: On the 1971 Ordnance Survey the site is shown as a “refuse tip” prior to when proper licensing/registration was required. The date of the landfill works predates the 1999 EU Landfill Directive regulations. I therefore believe that there is a danger that any disturbance would be health hazard due to the unknown materials.

I object to policy A44 in Send Hill on the basis that: GBC has installed gas monitoring wells on site since July 2000. One well has documented recording of methane gas discharge.

I object to policy A44 in Send Hill on the basis that: A Southern County Searches (Sitescope Ltd) report E.2978.SN_HCP dated 5th January 2005-Identifies the proposed site as GBC recorded landfill site Ref GU/11/LLC with type of waste not identified. The date of the landfill works predates the 1999 EU Landfill Directive regulations. I therefore believe that there is a danger that any disturbance would be health hazard due to the unknown materials.

I object to policy A44 in Send Hill on the basis that: A Southern County Searches (Sitescope Ltd) report E.2978.SN_HCP dated 5th January 2005-Identifies proposed site GBC recorded landfill site Ref GU/12 with type of waste identified as “unrestricted”. This causes concern as to what it does contain and the dangers if disturbed.

I object to policy A44 in Send Hill on the basis that: An Envirosearch Report RS1100201_1_1 dated 17th February 2004 and historical map data and information from GBC has identified the site as landfill and has “areas of potentially contaminative industrial activities” and “potential risk from landfill gas migrations”. Development of this site would be a health hazard.

I object to policy A44 in Send Hill on the basis that: The site is unsuitable for a traveller site as it is away from the Village centre and approximately one mile from the shops and the nearest bus stops.

I object to policy A44 in Send Hill on the basis that: The road Send Hill at the entrance to this site is 2.3 metres wide, very narrow and additionally unsuitable for long vehicles and on the opposite side of this narrow road is the multi-denominational Send Cemetery.

I object to policy A44 in Send Hill on the basis that: Existing road and parking infrastructure is already inadequate or under pressure and would worsen with the planned development, reducing quality of life.

I object to policy A44 in Send Hill on the basis that: Existing health infrastructure is already inadequate or under pressure and would worsen with the planned development.
I object to policy A44 in Send Hill on the basis that: This area has been extensively used for sand and gravel extraction and has since been filled with refuse and is therefore unlikely to be suitable for building. The lane is designated SSSI and monitored by The Surrey Wildlife Trust. The roads serving this area are extremely narrow lanes without footpaths and people attempting to walk from here to the Send village shops would be at risk.

I object to policy A44 in Send Hill on the basis that: The drainage and sewerage systems in this area of the village of Send are ancient and frequently cause problems as documented by Thames Water Plc. More housing and road users being added would simply increase the problems further.

I object to policy A44 in Send Hill on the basis that: All proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford’s urban Brownfield areas much closer to existing transport hubs.

I object to policy A44 in Send Hill on the basis that: The proposal to include 2 Travellers Pitches is completely inappropriate due to the narrow width single track country road providing insufficient access to the site.

I object to policy A44 in Send Hill on the basis that: The government’s most recent policy for traveller sites was published in August 2015 and sets out the best approaches for planning for traveller sites. Since the Borough’s current Traveller Accommodation Assessment was published significantly before the 2015 guidance, it should be considered out of date. The dated nature of the 2012 assessment is recognised in the June 2016 Sustainability Appraisal, which states on page 94 that the Council have decided to over-allocate traveller sites in light of the dated evidence base.

I object to policy A44 in Send Hill on the basis that: This site is allocated for 40 homes and 2 Traveller pitches. Send Hill is a very narrow road; two cars have difficulty passing one another in places. An additional 40 homes would significantly increase the chances of two cars meeting, resulting in congestion and access issues with little scope to widen the road.

I object to policy A44 in Send Hill on the basis that: Send Hill does not have any pavements for the majority of its length and would be difficult to walk along, especially for those with push chairs or mobility problems.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2665  Respondent: 15271969 / Denise Humphriss  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to policy A44 in Send Hill on the basis that: The proposed development is not sustainable because of poor infrastructure. Send Hill is a single track country road and too narrow to provide sufficient access to the site for travellers or accommodate the potential new levels of traffic the proposed development would bring.

I object to policy A44 in Send Hill on the basis that: The road Send Hill at the entrance to this site and the approach from Potters Lane is very narrow. Any alternation to improve visibility as acknowledged in the revised GBC Local Plan is not practical due physical limitations at the junction of Send Hill and Potter Lane. Without this alteration the approach road is unsuitable for the increased traffic including long vehicles that will result from developing this site.

I object to policy A44 as building further houses at Send Hill would exasperate the problem of inadequate access due to increased traffic volume. Send Hill is far too narrow to take any more traffic. The junction with Potters Lane is already very hazardous for vehicles emerging into Potters Lane. Any alternation to improve visibility as acknowledged in the GBC Local Plan is not practical due physical limitations at the junction of Send Hill and Potter Lane.

I object to policy A44 as it is in direct conflict to Local Plan policy H1. This policy states that “Gypsy, Traveller or Traveling Show-people accommodation should be provided on development sites of 500 homes or more whilst there remain an identified need”. Site A44 has only been allocated 40 houses and so has therefore been disproportionately allocated 2 pitches.

I object to policy A44 as it is in direct conflict to Local Plan policy H1. This policy states that “Gypsy, Traveller or Traveling Show-people accommodation should be provided on development sites of 500 homes or more whilst there remain an identified need”. The GBC Traveller Accommodation Assessment does not justify an identified need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** SQLP16/437  **Respondent:** 15272321 / Danny Skillman  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

1. The evidence for housing needs is not verified and validated.

2. The requirement for retail space increase is not valid.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: SQLP16/438  Respondent: 15272321 / Danny Skillman  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

The plan lacks soundness as it fails to demonstrate need for housing, need for green belt development and need for retail space increase.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/440  Respondent: 15272321 / Danny Skillman  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

I object to the plan for the following reasons:

1. The predicted housing needs are unvalidated.
2. The use of Green belt land for development is unsustainable and unnecessary.
3. Insufficient emphasis has been placed on cycling and walking strategies throughout the borough.
4. No reference has been made to the provision of student accommodation on University of Surrey campus - for which they have permission and have failed to build. This would relieve pressure on housing in the town.
5. Insufficient thought has been given to higher density accommodation on brownfield sites in the town.
6. The plan is illogical in saying there is a need to relieve traffic congestion but suggesting 65,000 sqm of retail space is needed - generating significant traffic movements. This space could be used for housing which generates less traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1237  Respondent: 15272481 / Residents Association Beechcroft Drive (Arjen Naafs)  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? (Yes), is Sound? (Yes), is Legally Compliant? (Yes)

Answer (if comment is on questions 1-7 of the questionnaire): ()

Please see the attached document for details comments from Residents Association Beechcroft Drive concerning Site 26.

[Text of representation below]

Re: Strong Objection to Blackwell Farm development A26

Dear Sir, Madam,

Beechcroft Drive is located close to the proposed development on Blackwell Farm and we have an intimate knowledge of the proposed area and its surroundings. As a Residents Association, we have come to the conclusion that we strongly object the development, based in summary on the following points:

1) The traffic associated with 1800 houses simply cannot be supported by the local road network and will lead to:
   a. Larger congestion around the Royal Surrey County Hospital - ultimately threatening accessibility for emergency services.
   b. Traffic trying to avoid cathedral roundabout will be diverting to Onslow Village and Park Barn – thus affecting safety, pollution levels, and liveability for residents in a much larger area.
   c. Further gridlocking of A31, A3 and Farnham Road on daily basis, leading to reduced accessibility of Guildford from the South and West as a whole, with all economic and social implications. Adapting local roads, the A31, A3 and cathedral roundabout to cope with this traffic will be extremely expensive and arguably make the A26 (Blackwell Farm) development financially unviable. This is supported by the Technical Note by the Traffic Consultant RGP as presented by Compton PC.

2) Furthermore, infrastructure should be improved prior to any construction; this includes enhancing hospital capacity – which is not planned at the moment - and secondary school capacity. Both are known to be under pressure at the moment.

3) The Blackwell Farm area is very visible from the Hog’s Back and as such will destroy the views from the Hog’s Back ridge - a nationally designated Area of Outstanding Natural Beauty. Removing greenbelt and AONB has detrimental impact on setting of the town, availability for future generations and removal of valuable farming land - which is very scare already in the South-East, seems inappropriate.

4) The ancient woodlands (last remainder of Medieval royal deer park of Henry II) play an essential part in the local eco-system of the larger Hog’s Back area. The railway line and building to the North, and the proposed large scale developments in the West, would mean that migration to and from this essential habitat is limited to the South. The proposed road from the Blackwell Farm to the A31 effectively completes the isolation and cuts natural migration patterns to the woodlands completely. From ecological point, this removes (one of) the largest forests west of Guildford from the greenbelt and places it within the urban area (Figure 1):

[See attachment for figure 1]

5) We further support the Guildford Residents Association in its observation (Report Neil McDonald) that the housing needs as per the local plan are overestimated, and as such development plans are over designed (even excluding consequences of Brexit)

6) The Blackwell Farm site includes 6 Travellers pitches, which we believe should be sited in more sustainable locations (not within greenbelt). In addition, counting them towards the developer’s quota of affordable housing is a ludicrous
method to try to fulfil the obligation of providing affordable housing. We therefore object to them, as well as the rest of the large-scale development being included within site A26.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: BCRAfig1.png (658 KB)

Comment ID: pslp172/3617  Respondent: 15272481 / Residents Association Beechcroft Drive (Arjen Naafs)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As Beechcroft Drive is the nearest residential street to the proposed development on Blackwell Farm and we have an intimate knowledge of the proposed area and its surroundings. As Residents Association, we have come to the conclusion to strongly object the development, based in summary on the following points:

1) The change of accepting vehicular access and from the site to Egerton Road, preferably via Gill Avenue does not regard the safety and impedes access to the Hospital’s A&E unit and cause increased rat running through Onslow Village and Park Barn.

2) Though much welcomed, the Park Barn train station will not be sufficient to avoid significant traffic increase due to Blackwell farm development. In addition, the planning of Park Barn does not include essential cycling access in its design.

3) An independent traffic study commissioned by Compton Parish Council has shown that this new junction would result in more queuing on the Hog’s Back and on the A3 during the morning peak-hour, and as a result the villages of Puttenham, Compton and Artington would see a surge in traffic numbers as Guildford-bound drivers seek out the fastest route and divert along the B3000 and B3100.

4) The added clause in P1 “In accordance with national planning policy, there will be a presumption against major development in the AONB except in exceptional circumstances and where it can be demonstrated to be in the public interest, is much welcomed. However, holding A26 and the damage to the AONB against that very clause we remain unconvinced that a) exceptional circumstances exist (as growth figures are not extreme and arguably over-estimated) and b) that the construction is in the public interest (taking into account the considerable resistance against this scheme).

Correction of error in urban boundary – ancient woodlands

The previous revision included corrections in urban boundaries. However, one error near site A26 was overlooked and we use this consultation to bring it to your attention.

[Image]

In the proposed plan, the forest comprising of Strawberry Grove and Manor Corpse have been added to Guildford Urban area. We are convinced this is an error or oversight, otherwise we strongly object:

- Taking any area out of the green belt and adding into the urban area is strongly contested, and only to take place under exceptional circumstances (see Policy P1). Removing forested area from the Greenbelt and adding into urban area is clearly not justifiable and as such can only be considered an error and need to be corrected
- The possible argument that it is all part of the same Parcel, does not make sense, as urban boundaries are made disregarding the parcel boundaries – see the suggested urban boundary around the much debated road from site A26 to the...
A31.
- Removing ancient woodlands and including it in the urban area is mistaken on both sides 1) rural area and green belt is reduced and 2) land is added to the urban area that has no development option now or in the future and as such cannot and should be considered urban.

As such, we **strongly recommend** you to correct this error to the following outline:

![Image]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [2017 07 22 Beechcroft drive residents association objection to SRN6 removal site A26 and correction urban boundary.pdf](366 KB)

---

**Comment ID:** PSLPS16/1122  **Respondent:** 15272545 / Wiliam Sutton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A15

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( No ), **is Legally Compliant?** ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

The proposal to build housing around the Cathedral has a number of implications that will be detrimental to the existing and new residents of the town.

Firstly, the road access to the site is all through small local roads. This will create increased traffic at a number of small junctions and bring more cars into an already congested area of Guildford. I can see no reason why the site should not be accessed from the Cathedral's own access road. Access via the Cathedral would mean that residents' trips to and from the A3 would not need to travel down Rigdemount, Madrid Road or Arlesford Road. At a minimum, if the development does go ahead, then the construction traffic should be via the Cathedral.

Secondly, this area is prone to localised flooding after moderate rain storms. Water often flows down Rigdemount and into residents' gardens and driveways. Replacing water-absorbing grass and woodland with water-repellent tarmac will only exacerbate this problem.

Thirdly, the space around the Cathedral is one of the few areas of green space in central Guildford, it is used as a recreation area by families and allows views to and from the Cathedral. All of this will be lost if development goes ahead.

Finally, whilst this plan does not detail the type of housing for the site, those presented by Linden homes and the Cathedral are totally out of proportion to the area and will have a major impact on the privacy and

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/1128  **Respondent:** 15272929 / roger kendall  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A18
Unfortunately the college is going through a difficult time, possibly through poor leadership. If it sells off its property it will not be in a position to take advantage of a future improvement in the college operation. This is short term thinking which should be avoided.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/1148</th>
<th>Respondent: 15272929 / roger kendall</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A22</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This level of building is totally unsuitable to an area where the roads are presently inadequate and is far to close to the SSI besides the loss of green belt separation between towns.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPS16/1149</th>
<th>Respondent: 15272929 / roger kendall</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A30</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A road bridge would a great improvement, subject to good access to the industrial site, which provides much small business employment and shielding of the houses nearby from being overlooked by the road. It would be better to have proper houses not a traveler site. The industrial site would benifet from extra parking for the businessess employees and visitors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/1129  Respondent: 15272961 / Naomi Vary  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A15

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I am concerned to see the current use of the land described as being open space and residential properties; the land is currently designated as a Protected Open Space. The small number of residential properties constructed for Cathedral staff has not altered this, and should not be used as a precedent to permit the excessive development proposed for the site. There are a number of reasons why the site cannot support 100 properties:

1. The open space around the Cathedral is enjoyed by a variety of local residents, as well as being one of the few open spaces for children to play in around this area. To lose the designation of protected open space would be a great blow for the community surrounding the Cathedral.

2. The land was purchased and given to the cathedral to stop the incursion of residential development up to the Cathedral and preserve the land around the cathedral as green open space. To lose the designation of protected open space would allow precisely the evil that the benefactor sought to prevent.

3. There is no indication that local infrastructure will be improved to cope with the demands of so many new residents. Schools and doctors' surgeries in the area are already over subscribed, and trains are at (or over) capacity at peak times.

4. Traffic is already a very significant problem in this area of Guildford. On weekday mornings Madrid Road/Guildford Park Road gridlocks from Ridgemount heading into town, and is at a standstill in the other direction from the Oval towards the A3. To have the additional cars from 100 properties travelling down Ridgemount and Alresford Road would exacerbate this problem. Those roads are also used as shared surfaces with pedestrians due to their narrow nature.

5. Much focus has been on the listed nature of the Cathedral, and the impact of 100 properties on that building. To develop the site to the extent proposed would be detrimental to the Cathedral's standing, as it would impact the views both from and towards the Cathedral. In addition, the scope of the proposed development is out of keeping with the semi-rural nature of the neighbouring roads, and would have a very negative impact on the surrounding area.

6. The cathedral site contains numerous underground springs, and drainage on the site is already poor. Ridgemount and the neighbouring road suffer from flooding after even minor periods of rain. Paving over a large amount of the site, and adding the burden of additional residential properties, will make this problem worse.

7. The requirement for new housing in the area will decrease following the restrictions on immigration that the government is set to introduce, and the predicted migration of jobs to Europe. We have already seen demand for housing drop and most economists predict that this will continue.

Although the reduction in proposed housing from the earlier version of the local plan is welcome, I would ask that the redesignation of this site to be withdrawn. I would be grateful for a receipt to show that these comments will be considered.

Yours

Naomi and Richard Vary

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### Comment ID: SQLP16/446  Respondent: 15273057 / steve sage  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

the transport infrastructure is already inadequate. I do not believe that a gap town such as Guildford can ever have the road and transport infrastructure to support a 25% increase in population

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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### Comment ID: SQLP16/447  Respondent: 15273057 / steve sage  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** (Yes)

I support the Guildford Residents Association response and oppose Guildford expanding by a quarter

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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### Comment ID: SQLP16/448  Respondent: 15273089 / Jason Gaskell  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** (No)
Inadequate information about flood risk. Inadequate consideration of traffic and infrastructure impact. Inaccurate assessment of school capacity.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/449</th>
<th>Respondent: 15273089 / Jason Gaskell</th>
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<td><strong>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</strong></td>
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Instead of massive development at one or more sites in Guildford, why not create small pockets of development in all villages across the Borough? This would obviate the need for large scale infrastructure development, would breathe life into moribund communities and allow, through a mix of marketing, affordable and social housing, more people to live in the Borough.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: SQLP16/450</th>
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<tr>
<td><strong>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?</strong></td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I fundamentally OBJECT to the Local Plan as proposed, especially the impact it would have on Normandy and its surround, based as it is on a false assumption about school need, and being driven as it is by developer aspirations not local need. As previously mentioned, a broad package of small development across the Borough would be far better, even if economies of scale could not be achieved by developers.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
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<th>Comment ID: SQLP16/451</th>
<th>Respondent: 15273217 / Peter Shaw</th>
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<td><strong>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</strong></td>
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</table>
**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire):** (No)

I object to the SHMA that is presented by Guildford Borough Council. It is in my opinion, unsound and the detail to be able to fully scrutinise this document is not available, to myself. I have no visibility over the model or formula used to calculate the numbers in the SHMA and as such have no confidence in it. The fact that GBC has got the contractual leverage and ability to force GL Hearn and its sub contractor Justin Gardner Consulting to release these, but does not, and that GBC has failed on several accounts to scrutinise the SHMA within the council, makes me believe this document has been written with 'Policy On' inputs whilst this document should have been prepared in a 'Policy off' mode as required by the NPPF. As the SHMA, in my opinion, forms the back bone of the Local Plan by providing an OAN to then hang all other policies from, without having confidence in the SHMA I have no confidence in the OAN and hence the rest of the Local Plan and consider it all to be unsound.

The specific reasons why I find the SHMA unsound can be found in the attached document written by Cllr David Reeve, which I fully endorse.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**  [Guildford OAN Review.docx](#) (44 KB)

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**Comment ID:** SQLP16/452  **Respondent:** 15273217 / Peter Shaw  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object to the Local Plan as it currently stands. I wholeheartedly endorse the views expressed by the political group Guildford Greenbelt Group on this matter and consider their response reflects my own thoughts on this matter. As such I attach the GGG response below and support each and everyone of those statements, so please consider them to be my own response to the Local Plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**  [GGG Objection to GBC Local Plan 15 July 2016 1.1.doc](#) (716 KB)

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**Comment ID:** pslp171/2252  **Respondent:** 15273217 / Peter Shaw  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2017 / Policy S2  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
I object to the local plan (Proposed Submission Local Plan: strategy and sites 2017) in its current amended form, my submission should be taken into account as the proposing housing target has changed to 12,426 and my submission is a comment on this altered figure and the confidence the public have on this newly proposed figure. The proposed housing target is based on assumptions that have not been made public and includes flaws that have not been corrected in the modified SHMA.

The 12,426 proposed housing target figure (with an annual rate of 654 new homes per year) is a significant uplift compared to the current 2003 local plan that is in effect now (which has an annual housing target figure of 322 new homes per year). As the proposed housing target figure is over double the 2003 current target figure, it is imperative the local plan justifies this uplift in significant and accurate detail, to give the local population confidence in the proposed plan.

However the proposed local plan and recent amendments fall short of this by a significant margin. Guildford Borough Council outsourced the formulation of the Strategic Housing Market Assessment (SHMA) to GL Hearn. GL Hearn produced a SHMA that detailed key findings and figures, however the exact manner of how these figures were formulated and calculated were not disclosed. When relevant FOI requests were made to Guildford Borough Council on how these figures were calculated, the council responded that these calculations could not be disclosed due to commercial sensitivities. As a member of the public I have had to take on face value that the figures produced in the SHMA are accurate and are robust. This is not transparent governance and this is not fair to the public, we are being asked to consult on a local plan that we can not scrutinise in detail. The proposed housing target figure is a key bedrock to the rest of the local plan as it effects how much land in the borough needs to be set aside for development and not to be able to scrutinise this figure in detail means I have no confidence in this figure and the local plan as a whole.

As the exact nature on how the figures reported in the SHMAs are calculated and protected behind 'commercial sensitivity' clauses are they not able to be scrutinised by FOI requests. I recently asked Guildford borough council if they had fact checked or scrutinised the recent 2017 SHMA documents themselves. At first they misinterpreted my request and after a formal review of my FOI requested GBC responded (the first response is attached as a word document and the internal review response is added to the end of this submission as an appended email);

Extract from response;

"Planning Services have reviewed your comments of 26th June and respond as follows:

- Edge Analytics (demographic company) were commissioned to review both the Guildford SHMA and an earlier version of the West Surrey SHMA. This provided the Council with reassurance regarding the robustness of the methodology employed by GL Hearn in preparing subsequent iterations of the SHMA.
- The Council commissioned Edge Analytics to review the Guildford SHMA and Waverley Borough Council commissioned them to review an earlier version of the West Surrey SHMA. Both these reports were analysed by officers to validate the robustness of the findings and understand any concerns raised or recommendations for additional work.
- The Council does not possess a copy of the demographic model used to prepare the SHMA nor does the Council have an alternative model through which to run a comparative analysis of figures. The Council utilised a specialist company (Edge Analytics) to critically review the work. Both these reports by Edge Analytics were made available to you in the response on 26th June 2017."

Although not clear at first read through, the above (in parallel with the attached initial response from the council) is an admission by the council that GBC have not fact checked or scrutinised the figures in the recent local plan submission, provided to them by GL Hearn. Edge Analytics scrutinised the 2014 SHMA, not the 2015, 2016, 2017 SHMAs (or recent amendments)! After Edge analytics had reviewed the 2014 SHMA significant errors were still found within the 2014 SHMA data and it was publically believed to be not fit for purpose. How the council believes a flawed SHMA produced by GL Hearn can be robust in its methodology after a failed review process by Edge Analytics is beyond belief. If the 2014 SHMA was so wrong how on earth can the public have any confidence that GL Hearn can produce a reliable 2017 SHMA especially as it has not been reviewed by anyone within the council or contracted by the council!

This response from the council proves the Council has not conducted any recent reviews on the provided figures in the most recent proposed local plan with amended figures. Seeing as the calculations behind these figures are protected by 'commercial sensitivities' the public has to have confidence that the figures have been scrutinised to a reliable level, which
in this case it has not. As the amended proposed housing target figure is such an important figure to the rest of the local plan this makes the whole proposed Local Plan unsound and as such the whole amended plan should be rejected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: FOI2017.00290_response_26.06.2017-1.docx (27 KB)

Comment ID: PSLPS16/1134  Respondent: 15273249 / Valerie Cheesman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

We strongly object to policy's A46, A47 and A49 in the Draft Local Plan June 2016

1. Taylor Wimpey has been proposing this development for at least 3 years. Their early submissions proposed 600, then 700, then 1100 houses. This is entirely developer led and has no basis in empirical logic. Taylor Wimpey has funded all the reviews of flooding, transport and structural proposals and this lacks objectivity.
2. Safeguarded land according to NPPF should not be developed within the term of the plan in which it is allocated. Therefore this land even if it was safeguarded should remain undeveloped for a period of between 10-15yrs the term of the new plan.
3. The insetting of Normandy/Flexford (Removal from the Green Belt) is unlawful. The Green Belt is to stop urban sprawl, by insetting it allows urban sprawl.
4. The A46 site was proposed for safeguarding. It was not actually safeguarded. Safeguarding is a category of land for long term development and is available to the council should it be needed. Land has to be formerly safeguarded in a plan and as part of it. This was not the case and the land remains as sensitive green belt land.
5. There is no case in law which supports the argument that a school trumps green belt status. This is entirely objective on the part of planning policy.
6. The argument that Normandy/Flexford do not contribute to the openness of the green belt is incorrect. There is no foundation for this statement. It is entirely based on the need to inset the village.
7. Transport improvements are very vague and will be from developer profit. 3 Million has been earmarked to improve the Aldershot Road, Wanborough Hill and A31 access. This is way below what will be required and the road system is utterly unable to cope with this proposal.
8. A46 has been designated as not a flood risk. It is a flood plain as can be seen from the vegetation that grows there, willow trees, reeds, etc. and floods on a regular basis.
9. Boundaries under NPPF definition need to be examined. They need to be natural, permanent and defensible. The island boundary at Palm Nurseries is none of these.
10. The process is flawed and there is no adherence to NPPF legislative proposals.

Conclusion this is unlawful.

Any development on these plots would have a detrimental affect on habitats and wildlife that use these areas of land and in some cases could contribute to the national and local decline of a number of these species. This would be a great loss not only to all the residents who live in the Parish, but also visitors who come and enjoy the natural beauty of the countryside by walking, riding and cycling along many bridleways, public rights of way and permissive footpaths.

These are some of the wildlife recorded.

Hedgehog, Stoat, Weasel, Wood mouse, Field vole, Bank vole, Water vole,
Dormouse, Badger, Fox, Roe deer, Rabbit, Barn owl, The red kite,
Little owl, Tawny owl, Fieldfare, Redwing, Song thrush, Mistle thrush, Skylark, Linnet, Goldfinch, Reed bunting, 
Yellowhammer. Green woodpecker, Great spotted woodpecker, Nuthatch, Buzzard, Sparrowhawk, Grey heron, Common 
lizard, Grass snake, Adder, Slow worm, Common toad, Common Frog, Smooth newt, Palmate newt.

Butterflies
Red Admiral, Meadow brown, Ringlet, Grayling, Holly blue, Small blue, Brimstone, Small copper.
Not forgetting the Stag beetle, Banded demoiselle damselfly, Beautiful demoiselle, damselfly.

It should be noted that the area mentioned A47 is an SNCI. The Flax Pond and stream at Little Flexford have records of 
Water voles (a very rare and protected species, and great crested newts also a European Protected Species.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Vals Objection Local Plan.odt (22 KB)

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Comment ID: PSLPS16/6102  Respondent: 15273377 / Tracey Geaves  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A19

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally 
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As a tenant of the allotments on the site adjacent to the allocated for new homes I have no objection to these being built. I 
would just like to stress how important it is that the land used for allotments is not disturbed whilst any development takes 
place.

After reading the Proposed Submission Local Plan I was surprised to see that allotments in general are not included in the 
description of blue and green infrastructure under Policy I4. Allotments meet the needs of relaxation, exercise, recreation, 
visual amenity, wildlife habitat and agriculture just as much, if not more, the parks, open spaces, private gardens, 
agricultural fields and woodland listed so should certainly be included.

To give you an example, last week I visited the allotments early in the morning only to find a hedgehog on my plot. This is 
the first hedgehog I have seen living wild during my 36 years. This illustrates the need to avoid disruption to the wildlife on 
the adjacent site.

It is also essential that the access to the lower end of the site, off Westway, remains the same as it currently is. The 
allotment land slopes sharply down to this access point and this is really the only suitable access point for most of the site 
by vehicle. It is regularly needed by tenants transporting heavy items, such as garden tools or plants, to their allotments and 
would be essential for an emergency services vehicle in the case of accident. A number of then tenants are elderly would 
struggle without the use of this access.

Allotments also contribute greatly to the local community, in an age where many people no longer interact with their 
neighbours they provide a way of meeting local people with shared interests. They encourage healthy eating and regular 
exercise as well improving mental health.
Looking at the size of the site for the proposed new homes I wouldn’t expect each of the 38 houses to have its own green outdoor space so the allotments would therefore be a benefit to new residents, both visually and as potential allotment tenants

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/6071  **Respondent:** 15273377 / Tracey Geaves  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A21

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing regarding Policy A21: Land at Westborough allotments, Guildford, part of the Proposed Submission Local Plan.

I support the policy to protect this open space and ensure it is in no way subject to any development.

In particular I would like to emphasise the importance that the lower vehicular access to the allotments, via Westway, is retained. The allotment site has a steep slope running from the Woodside Road entrance down to the West Way access point. This makes the Westway access point the only suitable entrance for the majority of tenants and any emergency services vehicles should an accident occur. A number of the allotment tenants are elderly and rely on this access to transport materials to their plot via car. If this access was altered there would be a real risk that medical attention would be severely delayed in an emergency and current and potential tenants would be put off keeping a plot.

I also believe the allotments should be included in the description of blue and green infrastructure under Policy I4. Allotments meet the needs of relaxation, exercise, recreation, visual amenity, wildlife habitat and agriculture just as much, if not more, the parks, open spaces, private gardens, agricultural fields and woodland listed so should certainly be included. I have only had my plot since April but have already seen a great deal of wildlife at the site, including seeing a hedgehog from just a couple of feet away, the first one I have seen living wild in my 36 years. I am already reasonably fit and healthy but in the four months I have had my plot I have been much more active and am eating a wider variety of fruits and vegetables. I live on Barrack Road and know a few of my neighbours, but there is not much of a community so it has been really nice to meet fellow plot holders at the allotments who share similar interests and feel part of a welcoming and supportive community.

I have been very impressed by the time many of the plot holders devote to supporting other tenants as well as running an educational programme for the neighbouring school. The current housing difficulties mean that many families cannot afford accommodation with access to their own outdoor space, therefore it is essential that spaces like allotments, where schools and families can actually interact with the land are retained. Looking at the site of the area next to the allotments where the proposed 38 homes are to be situated I would be surprised if there was room for a dedicated garden for each. The allotments will provide them with visually attractive surroundings and potentially an outdoor space if they were to apply for an allotment. The allotments are a very peaceful area and help to reduce traffic noise which is particularly welcome with the A3 being so close.

In summary the allotments should be recognised for contribution to the local infrastructure, both as a green space and as an essential part of the local community. The allotments have existed here since before the First World War and should not be affected by any type of development. They are a valuable resource and any alterations which do not preserve their current state would be a loss to future generations.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12439  Respondent: 15273377 / Tracey Geaves  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing regarding Policy I4: Green and blue infrastructure.

I would like to suggest that allotments be specifically included in the list of green and blue infrastructure. Allotments meet the needs of relaxation, exercise, recreation, visual amenity, wildlife habitat and agriculture just as much, if not more, than the parks, open spaces, private gardens, agricultural fields and woodland listed so should certainly be included. They are a valuable resource for local communities and should be given the same recognition and protection as other open spaces.

I have only had an allotment since April but have already seen a great deal of wildlife at the site, including seeing a hedgehog from just a couple of feet away, the first one I have seen living wild in my 36 years. I am already reasonably fit and healthy but in the four months I have had my plot I have been much more active and am eating a wider variety of fruits and vegetables. I live on Barrack Road and know a few of my neighbours, but there is not much of a community so it has been really nice to meet fellow plot holders at the allotments who share similar interests and feel part of a welcoming and supportive community.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1135  Respondent: 15273441 / Andrew Heffernan-McClelland  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the proposal in the local plan on the grounds that Send Hill I a single track country road and too narrow to provide sufficient access to the site or accommodate the potential new levels of traffic the proposed development would bring.

I object to the proposal in the local plan on the grounds that the proposed number of housing potentially could result in extra cars in Send Hill which is already suffering from congestion particularly at school run time.

I object to the proposal in local plan on the grounds that the 1963-8 Ordnance Survey maps of the proposed site mark it as "refuse and slag heap". It is therefore unsuitable for such a development on health reasons.

I object to the proposal in local plan on the grounds that the 1971 Ordnance Survey maps of proposed site mark as "refuse tip" prior to when proper licensing/registration was required. The date of the landfill works predates the 1999 EU Landfill Directive regulations. I therefore believe that there is a danger that any disturbance would be a heath hazard due to the unknown materials.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/454  Respondent: 15273697 / Ray Briggs  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

The evidence presented in the evidence base, particularly the basis of the calculations made, cannot be examined and as such are not valid for this exercise. These documents, and the basis for the conclusions drawn need to be clearly demonstrable and open to detailed challenge. At present this is not possible.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/457  Respondent: 15273697 / Ray Briggs  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)
The evidence presented in the evidence base, particularly the basis of the calculations made, cannot be examined and as such are not valid for this exercise. These documents, and the basis for the conclusions drawn need to be clearly demonstrable and open to detailed challenge. At present this is not possible.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: SQLP16/455</th>
<th>Respondent: 15273697 / Ray Briggs</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance</td>
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As the evidence base cannot be independantly reviewed this cannot be legally compliant.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Answer (if comment is on questions 1-7 of the questionnaire): (No)</td>
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The local plan is not sound for 3 reasons:

13000 plus home in 20 year is too great a burden to be put on the local area.

The loss of green belt land is not acceptable. The whittling away of this land is a variance with a policy to maintain the green belt and as such is not in the best interests of the borough or the country

The transport infrastructure plan is vague in the extreme. There is no clarity about what will be done, only vague indications. This borough is already at crisis point with respect to transport and the provision of 13000 new homes at or close to the A3 will lead to severe congestion that will affect the ability to deliver on the commercial aspects of the plan. In short the plan is fatally flawed and will not work.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: SQLP16/458  Respondent: 15273697 / Ray Briggs  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I would like to be sure that the proposed plan and the infrastructure changes proposed are alligned, practical and deliverable, and I do not trust the local council to deliver this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/459  Respondent: 15273697 / Ray Briggs  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

There is a presumption in the plan that this will improve the quality of life of the local population. Given that the plan will lead to local overcrowding, a lack of adequate health care or education provision, a dilution of local facilities (particularly for children) and most especially a complete breakdown in the transport infrastructure not only of the borough but the surrounding areas, this cannot happen.

The area will be blighted by this plan, and the likely increase in people desiring to locate businesses in the area will not happen, because those businesses will locate in areas with a working transport net and where they can attract the right staff.

If implemented this plan will condemn both the Borough and the county to being part of the greater London conurbation, and the individual character of the county and this town will be lost forever. Those proposing this should recognise the damage they are about to inflict on their local community.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/515  Respondent: 15273697 / Ray Briggs  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

There is a presumption in the plan that this will improve the quality of life of the local population. Given that the plan will lead to local overcrowding, a lack of adequate health care or education provision, a dilution of local facilities (particularly for children) and most especially a complete breakdown in the transport infrastructure not only of the borough but the surrounding areas, this cannot happen.

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If implemented this plan will condemn both the Borough and the county to being part of the greater London conurbation, and the individual character of the county and this town will be lost forever. Those proposing this should recognise the damage they are about to inflict on their local community.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Answer (if comment is on questions 1-7 of the questionnaire):** (Yes)

I have already made comments which object to the local plan in various ways. I am advised that these will only register as objections if I use the word 'object' in them. Please be advised that all my comments indicate that I strongly object to the building of a large number of homes in the borough. I strongly object to the lack of a defined plan for infrastructure as it means that the consequences of the local plan are not addressed, and I strongly object to the lack of transparency in the evidence base for the local plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPS16/1137</th>
<th>Respondent: 15273761 / marcus lines</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Introduction</td>
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I have grave concerns about policy "A26 Blackwell Farm" and the infrastructure plans for primary vehicular access via a signalised junction of the A31 and Down Place. The A31 is blighted by several miles of tail-backs during rush-hour where it feeds on to the A3. Living on the Hogs Back it can take over 30mins to access the A3 or Guildford centre. Without first addressing the problems of the A31 access to the A3, creating a controlled junction as traffic filters down into Guildford centre will further exacerbate congestion.

I read in the policy documents that further housing development will be considered once problems with the A3 have been eased. Will not a proportion of traffic from the proposed 1800 new homes be also using the A3. As a daily user of the A3 through I feel it is the area's biggest problem. The council must address the issue of traffic flow onto and along the A3 through Guildford before allowing more development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
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<th>Comment ID: PSLPS16/1144</th>
<th>Respondent: 15273889 / Corrine Mclaughlin</th>
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Objection to the destruction of Normandy and Flexford

To whom it may concern

Please find attached a letter that I have submitted in response to the proposal of GBC building in the green belt area of Normandy and Flexford. As stated in this letter, after investigation there is no exceptional need for these houses or a new school in our village. I ask that you advocate on behalf of our residents, so our community is not ruined by local developers driven by their own personal needs and not that of our community.

Dear Councillors

I am responding to the proposal of Guildford Borough Council (GBC) building on the green belt area in Normandy and Flexford, area 46 (A46). I strongly object to the plans for development of 1100 new houses and a new secondary school in this area. I will highlight the reasons I am against these proposed plans to build, and the negative impact they will have on the community, infrastructure, environment, and public health of the villagers.

The Community

Many residents who live in the proposed development site in Normandy and Flexford are middle age, or senior citizens. Most have lived in this area all of there lives or those who have moved into this area have done so because they chose to be within a small population and uncrowded area. People in my community have opted to live without traffic and noise of towns, and have chosen to have a rural, quiet, quality of life. This being a greenfield site and classed as an area of outstanding beauty (AONB) is part of the attraction in which people came to live this urban area in the first place. The safeguards to upkeep British countryside and uphold protecting village communities was part of the government's promise. Normandy and Flexford have being classed as a high sensitivity area as noted in 2014 draft local plan. David Cameroon also stated regarding such areas, "the government will protect green fields, and consult local residents in planning of green belt areas".However despite this statement, the community have not been informed or made aware that our community has been downgraded to a new strategic site for development approved by GBC.

This May, by chance, residents heard second hand that the development of Taylor Wimpey for 1100 houses and secondary school was being considered, and on the 6th June, shockingly the GBC approved this draft plan with a six week consultation period.

The fore mention population, myself and family included are stunned and angry at this action and feel there is neither a need or requirement for new houses or a new secondary school in a community with mainly retired or senior aged residents.

Government states that new schools are built when there is an exceptional need and pupils are in 95% capacity, but local schools in Normandy area are under subscribed( one school max 60% capacity). As stated in the Provision for Education in Surrey annual report in December 2015, no new schools were needed in the area and were not included in the recent 10 year plan. So why is a new secondary school planned with no exceptional need? This developer driven school appears to be an unnecessary waste of open space and a way of justifying building of the non-required 1100 houses. Destroying precious rural land when the government has stated that brownfield sites would be used before damaging greenfield sites appears to be happening in the case of A46.

The Infrastructure and Environment

The Oxford dictionary's definition of a lane is "A narrow road especially in a rural area". A narrow road or a lane has limited structure for regular heavy traffic such as Westwood lane and Glaziers lane. Westwood lane has a low bridge connected to Wanborough railway station, and driving under it is narrow, with only space for one vehicle at a time to pass through. How would traffic for the school run a and associated traffic cope on a road design for rural traffic.

Many local residents like myself and husband, enjoy a place to walk, cycle and horse ride in safe environment, this obviously will not be the case. In the last 20 years the traffic has increased on Westwood lane and Glaziers lane, There are frequent accidents on the junction of Green lane East and Westwood Lane, and locals have noticed the increase of speeding traffic. We do not have lighting on our roads to accommodate a school, and to improve visibility for safer roads, in doing so, would illuminate many of the residential homes. However in permitting more lit areas, it will reduce the privacy in current homes opposite proposed site areas.

I have also seen traffic backed up for hours on the Hog's Back trying to exit the top of Westwood lane and also to enter it. If more houses were built, the increase movement of traffic will not only be less safer for pedestrians, it will be detrimental to
the quality of roads and also increase the need for road works and resurfacing improvements. At the moment with heavy rain in the village, the roads flood, driving can be precarious, and drainage is difficult. With an increase of people in the proposed new 1100 new houses, the roads would not be able to cope. The noise would greatly increase, and air pollution have an negative effect on people, animals and wildlife.

If new residents from the proposed new houses with children move to our area, they will find limited facilities, no stores, shops. If families decide to use our small village local train station in Wanborough, the schedule is infrequent and limited. Extra cars parking here would increase congestion at this site, as there are few parking spaces in the small cul-de-sac opposite the station. A drive to shops in local village of Ash Vale or Guildford would also increase the burden of traffic on the roads.

As I said, Normandy is a rural village, with limited infrastructure, our small country doctors practice which is already over stretched with current residents will be oversubscribed if it was to include people in the new proposed 1100 houses. Normandy as stated before is a AONB, it has several deer, rabbits, badgers, and various wildlife. Due to the peaceful surroundings, it also attracts birds, bats and snakes. There is a diverse selection of flora and fauna. If the new houses and school are developed in this area the traffic increases on the two lanes (Westwood and Glaziers) in A46 will have a detrimental effect on enticing and retaining wildlife into the area.

Public Health

As mentioned before the Increased of air pollution will have an negative an effect both humans and animals, as will the additional of increase noise.

As a resident of 20 years in Normandy and living on this proposed development site, I feel vulnerable and intimidated by the thought of "bully boy approach" of GBC approving of development on land that was never intended be built on. Promises to consult residents have not been adhered to, and the well being and input of current home owners have not been considered.

Please do not allow destructive opportunistic development in the guise of needs of local people go ahead. Forward thinking planners of GBC and developers would be better off engaging with the community so they can gain a realistic awareness of the lack demand for implementing A46.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
2. I cannot understand why the developer has included the provision of a new secondary school. No evidence of need for school places in this location has been provided and the local County Councillor has discovered that there is spare capacity at existing schools. The argument therefore seems very cynical and creates a circular argument - we need the school so we need the houses and vice versa.

3. Although there is a train station adjacent to the site the transport infrastructure is inadequate for the traffic which will be generated by the construction phase and once complete. The Aldershot road and access up Wanborough hill to the A31 (Hogs Back) are routes which are already congested in peak hours and any additional traffic will cause significant problems.

4. The increased population from this development would add to the pressure on local wildlife. Domestic cats are already a problem for the local bird population along with the disturbance of dogs being exercised on the Ash Ranges area. The small areas provided in the development will be inadequate for the numbers pets which will be resident in the proposed development. I believe the area I referred to as Ash Ranges is technically the Thames Basin Special Protection Area.

I hope that GBC will now remove this site from the draft local plan. There are better sites within Surrey for this type of development although developers probably make good returns from this type of site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/4137  Respondent: 15274049 / Simon Gimson  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A47

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I support the withdrawal of policies A47 and A48 and I hope that the land North of the railway between Westwood Lane and Glaziers Lane will be protected for the long term

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/473  Respondent: 15274145 / brian medhurst  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I think a biased view of the evidence has been taken, where the pros of development in green field sites are given priority over the cons.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/474  Respondent: 15274145 / brian medhurst  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the sites and strategy is sound. I do not believe Guildford and the surrounding villages need any more loss of green field sites, in fact I would argue that some of the existing developments should never have happened. In my view Fairlands estate should not have been built, because it has created a seemingly overwhelming need amongst planners to infill the green space between Fairlands and the rest of Guildford with more development. This pattern has happened around the large sainsburys at burpham, and is happening around the royal surrey hospital/university. What starts as a remote development gets infilled and the conurbation expands. We have to decide on a point where we say Guildford is big enough, I believe we have already passed that point. You only have to try driving around Guildford at rush hour to realize that. Unfortunately I don't foresee us bulldozing large areas of housing and returning it to countryside. I like the semi rural nature of the villages surrounding Guildford I don't want them made bigger and eventually absorbed into one big town. I believe the Green belt should be kept and adhered to.

Another aspect of the strategy I don't agree with is the inclusion of traveller pitches alongside virtually every development. [Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1140  Respondent: 15274209 / Donald Wheeler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object for the following reasons. Site A29 is too vast and is too numerous in individual fields to be designated as a single site with no detail as to housing allocation and most is more aesthetically pleasing than areas already protected. Given the amount of information in the plan as a whole, is way too much for the general public to take in and understand in 6 weeks, the lack of thought and consideration for such a radical change to what is a semi rural area is disgraceful. When consideration is given to development already passed this will add over 2000 houses to an area already stretched for health provision and suffering gridlock at peak times, the bridge replacing the level crossing may not even happen, according to the representative at the drop in presentation, unless all the sites in the area are developed. The 1000+ houses and school in normandy can only make it worse. Since there is zero provision for additional industry and commerce as well as retail the plan actually promotes commuter and shopping journeys which seems ridiculous. The premise for the plan is that Guildford needs more housing yet this plan puts the bulk of that housing as far away from the town centre as possible. A more honest statement would be London needs another commutable suburb. To the North of Ash Green Road is actually Ash Green as proven by the map in use, this should therefore have been included in the Ash Green map and the green buffer clearly shown. The provision of additional/replacement green belt means little when its development can be assigned.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5426  Respondent: 15274209 / Donald Wheeler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The changes to the plan have created even more contradictions to what it hopes to achieve and what it proposes. It says that it proposes to reduce the need to travel and energy consumption and then increases the number of sites in policy A29 and the number of homes allocated to 1750+ in an area where there is insufficient wealth creation at the very edge of the borough to employ the existing population let alone these proposed new residents, thereby creating even more commuter journeys. Ash and Tongham is being considered as a town when by definition they are not since a town is a place where people not only live but also work which is patently, not the case. Ash, Tongham, Ash Vale and Ash Green should still be afforded their individual identities and would have had, if the green buffer area which is now so important between Ash, Tongham and Aldershot, had been applied to them in the recent past. The green,Tranquil buffer (4.3.34) actually sits aside 4 lanes of fast moving traffic (except at peak times when the traffic is anything but).

The increase in the number of sites in policy A29 added to A28 means an increase of new homes in excess of 1800 new homes, all on green field sites in villages already known to be the second largest urban conurbation in Guildford borough. This increase is only surpassed by the proposed Wisley allocation of 2000. It does appear that other villages within the borough are not having to give up so much of their pleasant environment as Ash, Tongham and surrounds have done in the past and now again in this ammended plan, not that I have any wish to see this "chase for growth and push the debt on the next generation" attitude inflicted on anybody else.

The site allocation of policy A29 now includes areas of Ash Green to the north, south and east of Ash Green road and South of Foreman Road which the plan purports to protect without any consideration for a green buffer apparently so important elsewhere.

The amended plan purports to protect sites of historic interest yet policy A29 is in direct conflict with this given its impact on Ash Manor.
The admission that the local infrastructure doesn't meet the needs of many of its residents and is considered poor by many (para 4.6.1) will not be addressed by infrastructure improvements for only those in these new developments (policy Id1). Thereby diminishing further the living standards of the existing residents due to the blight of new development as admitted in policy Id1.

The site apportioned in policy A29 for the new road bridge to relieve congestion caused by the Ash station level crossing has been deleted and is not identified elsewhere which suggests no priority for such an important infrastructure necessity now, regardless of future development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3854  Respondent: 15274241 / Chris Finden-Browne  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• I object to the plan on the grounds that it is based on unsound and questionable evidence in several areas:
  ◦ The Strategic Housing Market Assessment 2015 (SHMA) uses an estimate of number of houses needed to population growth which overstates the number of houses needed. Further, a larger proportion of any house building can be set on brownfield sites.

Guildford Borough Council's own Transport Assessment was not even available when the councillors voted on the Plan on 24 May - it was published on 6 June.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3855  Respondent: 15274241 / Chris Finden-Browne  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the overall impact upon Send on the grounds that the local infrastructure impact will be massively detrimental, and would strain its capabilities and capacity to beyond breaking point. The main road through Send (A247) is already overloaded for considerable durations during morning and evening rush hours: there is extremely limited capacity for additional volume. The area is already highly prone to flooding - significant loss of open land (to tarmac, concrete and buildings) and of trees will exacerbate the flooding risk and occurrences. There are specific infrastructure impact implications which are covered in the individual points below.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7226  Respondent: 15274241 / Chris Finden-Browne  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• I object to Policy A43 which covers 30ha of land at Garlick's Arch, Burnt Common on multiple grounds:
  ◦ Again, this site is a new entry in the Plan and was NOT included in the Regulation 18 draft or previous consultations.
  ◦ There is no need for an additional 400 houses on top of the 13,860 already proposed for the borough.
  ◦ The proposed industrial development of 7000 sq m is not required: the latest Employment Land Needs Assessment 2015 (ELNA) shows an 80% reduction in required employment floor space from the previous draft plan. If such space should indeed be required, it should be located at sites already serving this purpose, such as Slyfield.

The site contains ancient woodland, an already too rare occurrence in these environs for which the loss would be significant.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7227  Respondent: 15274241 / Chris Finden-Browne  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
• I object to Policy A44 which covers development on land west of Winds Ridge and Send Hill on several grounds:
  ◦ This site is a new entry in the Plan and was NOT included in the Regulation 18 draft or previous consultations.
  ◦ A significant part of the site has documented unsafe historical landfill waste on which the impact of building is unknown and could easily be detrimental to the health of new and existing residents.
  ◦ Send Hill is unsuited to a traffic increase, especially for large vehicles such as associated with Travellers Pitches. The portion leading from the Send cemetery to Potters Lane is single track and both winding (so poor advance visibility) and steep. There would a dramatic increase in vehicles meeting other vehicles headed in the other direction with no easy or safe place to pass each other. Significant incidents of the 'road rage' type would likely occur.

The junction of Send Hill with Potters Lane is already dangerous and an accident black-spot. We have personal experience of this: turning right out of Send Hill has a high risk of moving into the path of vehicles travelling south along Potters Lane, as they cannot be seen until the right turn procedure is already committed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLP16/16183  Respondent: 15274241 / Chris Finden-Browne  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed changes to the Green Belt (policy P2), which would irretrievably change the character and identity of Send. Send and environs are an important 'green lung' between Guildford and Woking.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1790  Respondent: 15274241 / Chris Finden-Browne  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()
Overall, I object to the way in which Guildford Borough Council have not followed the correct process in creating the draft local plan. Major changes (such as a major new road junction on the A3, and an increase in proposed house building from 185 to 485) require full consultation under Regulation 18; in contrast, GBC have attempted to hide these changes within Regulation 19.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/476  Respondent: 15274273 / Timothy Stevens  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I understand from the new local plan that the Guildford Borough Council are proposing removing the Green Belt status from Chilworth. I most Strongly Object to this. I also object to the poor level of consultation that has taken place with local residents.

It is another example that perpetuates the distrust of the public of both local and central government.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1830  Respondent: 15274305 / Samuel Sheppard  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I live in Send Marsh and the proposed local plan will directly affect the quality of life in this area. In my particular area, Manor Road, we have already been subjected to so-called developers who purchased a large field behind us from the company CEMEX and as part of an apparent land-bank scheme sold 20+ plots to people who may or may not have realised that the land was Green Belt. The result of that of course was that the land is no longer managed (as it had been previously by a local farmer) and it is just a mass of very long grass, dandelions, buttercups and rag wort. Despite the attempts of the developer and the new owners of plots to frustrate the residents of Manor Road and others who live adjacent to the field, we managed to secure a prescriptive right around the perimeter of the field for the use of the local community, dog walkers etc. The developer was promising a grand residential estate – on Green Belt, with no sewage, road facilities or other infrastructure – and of course because of the current law there is no planning permission to build on the field. This field is included in the local plan. I OBJECT to the inclusion of this field in the local plan as an area of potential development.
because it will fly in the face of the current law protecting the Green Belt (which the current government pledged to protect); it would create untold traffic chaos for Send Marsh Road and the roads around Send Marsh Green; building the infrastructure and facilities needed to provide for further homes would cause extensive disruption and damage to local amenities such that life here would become intolerable.

In relation to the local plan overall:

1. **I OBJECT** to the removal of Send Village from the green belt. As I understand it the the Green Belt was intended to be permanent (National Planning Policy Framework) unless there are special circumstances in a particular area to deviate from that principle. There are no special circumstances justifying ripping up the Green Belt around Send. Send has an ancient history; it is in the Domesday Book and should be entitled to protection from the destruction of its village character. Why do people choose to live in Send, Send Marsh, Ripley, Clandon and other similar villages in Surrey? It is because of the quality of life afforded by the beauty and tranquillity of the Green Belt, which if built upon and built upon will be lost forever. We have a duty to protect it for future generations. Local government and central government have a duty to protect the Green Belt and honour their election promises. Removing Send from the Green Belt, and indeed Ripley and Clandon, would inevitably lead to the creation of a large conurbation linking these villages directly, in physical terms, to Guildford and Woking and thus destroying the villages in the process.

1. **I OBJECT** to the proposed building of 45 houses at Clockbarn Nursery because there is inadequate access and traffic volume would increase to an unmanageable level. Tannery Lane is a narrow and twisty country road and could not accommodate a large increase in traffic. The junction with the main road is hazardous and would become more so with increased traffic. The recent planning go-ahead for apartments at the Tannery and the marina by the Wey Navigation will already create added traffic volume. Allowing more development will multiply that to a level with which the area could not cope.

1. **I OBJECT** to building 400 houses and 7000 square metres of industrial space at Garlick’s Arch opposite Send Marsh Road. Slyfield is already an industrial site and could easily accommodate the further space proposed. I am not persuaded that sufficient consideration has been given to brownfield sites for any further development. Garlick’s Arch is covered in ancient woodland, which would suffer as a result of development. Send Marsh Road is already a busy road, particularly in school term time as it is effectively a rat run which becomes gridlocked in the mornings. This proposal in the Local Plan will exacerbate the traffic problem to an unacceptable level. Algorithms and mathematical equations used to predict housing needs in the future are all very well, but predictions may or may not come true. Nobody except the consultants who did the calculations know the methodology used to arrive at their prediction. What exact considerations did they take into account? For example, what about Brexit? Everyone predicted the UK would remain in the EU but the opposite happened. Now that we have embarked on this disastrous road to Brexit what of the European companies based in Guildford, for example. Are they going to remain? Are European students still going to flock to Surrey University? Major Tim Peake, the British astronaut, recently expressed serious concern about the future of science in the UK after Brexit. Surrey University is a leading university in science and technology, particularly space science. If science declines, if foreign investment declines and companies leave the UK and foreign students no longer come to Surrey to study surely the housing and employment needs will be greatly reduced.

1. **I OBJECT** to the development of 40 houses and 2 travellers’ pitches at Send Hill. The narrow country road is inadequate for access. I understand the site contains unsafe landfill waste. Further it is a valued local amenity area which further development will spoil.

1. **I OBJECT** to a new interchange with the A3 at Burnt Common. This proposal by definition would mean that Send would become the traffic conduit to and from the A3, the M25, Guildford and Woking. Send Road, already bearing heavy traffic at peak times would become gridlocked. And if proposals for 2000 homes at Wisley Airfield, 2000 homes at Burpham and 1850 at Blackwell Farm were to get the go-ahead the problems of traffic, noise pollution and air pollution would be increased to wholly unacceptable levels.
To conclude: My objections are not based on NIMBYism but on genuine concern for the rural heritage of this area. There are things, even in this so-called modern world, worth preserving and the Green Belt is right at the top of the list. Destroying the Green Belt by allowing this Local Plan to go forward with its current proposals for development would, in my view, be a wholly retrograde step, which once carried out, would be irreversible. Surely development for future housing and employment needs can be achieved without the wholesale destruction of the Green Belt surrounding the Surrey villages of Guildford Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1141  Respondent: 15274337 / Darryl Taylor  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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The land of the proposed development is greenbelt and should not be built on. There is no need for a secondary school as all the surrounding schools are under used.
The area is a floodplain. The surrounding roads will not take the extra traffic. The sewage system is overloaded at present and will not take any further homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/487  Respondent: 15274369 / Trevor Deacon  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): (No)
The assessment of housing needs are unquantified and unexplained

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/453  Respondent: 15274369 / Trevor Deacon  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Green Belt, Policy 2 at paragraph 4.3.15

Send Business Park now taken out of the Green Belt altogether

I object to the proposal to inset Send Business Park from the Green Belt because:

- It is a historic, time evolved development in an area of natural countryside adjacent to the beautiful Wey Navigation. A beautiful area demonstrating the past growth of Send.
- The access road from either Send or Ripley/Send Marsh is completely unsuitable for a higher volume of traffic. (Single track)
- The existing development blends with the nature of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3480  Respondent: 15274369 / Trevor Deacon  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Land at Burnt Common, London Road, Policy A58.

Now a new allocation for a minimum of 7,000 sq m of industrial or warehousing

I object to Policy A 58 at Burnt Common because:

- The word "minimum" is a change from the previous "maximum" in the 2016 plan this gives no restriction to the overall size of the site whereas surely the purpose of the plan is to define the extent.
• There is no need to build industrial or warehouse development in the middle of the Green Belt.
• The impact on small surrounding roads will create traffic gridlock. The existing road (B2215) is already daily blocked by lorries using the site. The additional traffic will further block the surrounding single track and other surrounding minor roads. The existing A247 and B2215 roundabout already causes gridlock at peak times.
• The current Employment Land Need Assessment shows a reduction in demand not an excessively oversized destroying the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: SQLP16/480  Respondent: 15274465 / Marco De magalhaes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

The scale of development, particularly on GreenBelt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/481  Respondent: 15274465 / Marco De magalhaes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

We have more qualified people in our Parish council to participate at the Examination

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/482  Respondent: 15274465 / Marco De magalhaes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Altho I understand the need for housing but why not use Brownfield sites or industrial sites for building? It would help the environment and bring a solution to house shortage.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am very concerned about the proposed development in Normandy. Firstly, at present there is no need for another secondary school in the area. Both the nearest schools, Ash Manor and King’s College, are not oversubscribed so the only necessity to build a new school would be to accommodate the potential residents of the new undesired development.

This highlights the fact that this is a developer led campaign whose plans to build the school is what has been described as the ‘trump card’ when it comes to pushing developments through planning. It is a cause for concern that the planning policy is being dominated by a developer who does not have to take responsibility for the aftermath of this project. Their prime considerations will always be the profits such a scheme will generate with little thought of any other factors.

A further concern is how the roads of the area will cope. I accept that there is a station in the locality but even now many people choose to drive into Guildford rather than catch the train. At present it takes me an average time of 25 minutes to reach the school where I work despite it only being 3.5 miles away. By 7.45 both the A3 and the A31 are at a standstill and remain that way until beyond 9 o’clock. The Aldershot road is also snarled up at this time. The roads in this area cannot withstand the traffic that will be generated by this development.

Additionally, it can be assumed that many of the potential households will own dogs. The exercise of so many more pets will put intolerable pressure on the wildlife of the Thames Basin which harbours many rare species as well as the remaining green belt areas in Normandy.

Furthermore, this land is good agricultural land that is currently being used for crops and livestock which begs the question why it has been designated as an exceptional circumstance for removing from the green belt protection. Not only that but this land is waterlogged throughout most of the year and I cannot imagine that the existing drainage will cope with any impact this development will bring.

I hope you will take all these concerns into consideration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I do not believe this section to be legally compliant without consideration of the impact of the A3 widening and all additional infrastructure implied. This plan is essentially incomplete and does not include all the mitigations required in the form of additional roads or their impact. Also
   ◦ The plan does not include any analysis of how the junction with the A31 is to be designed, what that impact of signalising will be in terms of backing traffic up onto the A3.
   ◦ The plan requires that a link road is made between the A31 and Egerton road, which will be essential to relieve load on the A31 junction and provide alternative access to Guildford centre, the hospital and services, but provides no plan for how to do this and no analysis of whether this can be made sufficient to mitigate traffic impacts
2. I do not believe this section to be sound
   ◦ I object to such a large development (1800 homes) encroaching into countryside and destroying rural views from the Hogs Back Area of Outstanding Natural Beauty (AONB). To maintain the character of an AONB it is not sufficient simply to avoid development on the site itself. What makes it an AONB are the uninterrupted views both north and south.
   ◦ I object to this plan for Blackwell Farm being proposed separately to the A3 widening scheme. The viability of the plan depends upon sufficient A3 capacity being delivered and the whole environmental and traffic impact must be considered together. It must be very likely that the A3 widening is not built, or is only built after many years or in a different way to that envisaged. The Guildford Borough Transport Strategy 2016 acknowledges that the topography is very challenging
   ◦ However I also object to the widening of the A3 that is implied and required by the Blackwell Farm development. The noise levels and pollution from the current A3 are already very substantial for residents of Onslow Village. Much of the Arboretum is spoilt by the level of existing noise. The New Local Plan contains no details on how to mitigate the additional noise and pollution caused by widening and is not sound in this respect
   ◦ I object to the plan for adding a signalised junction serving the Blackwell Farm development on the A31. The location of this junction will cause traffic to back up on to the A3 and therefore cause tailbacks all through Guildford southbound, which are already very large. The A31 slip road from the A3 can only be enlarged by rebuilding the bridge over the A3 which is not part of this plan. Therefore the plan does not manage the impact of this junction.
   ◦ The location of the new A31 junction does not appear to allow traffic easily to turn right southbound. There is no coherent plan for this junction
   ◦ I object to the likely impact of the Blackwell Farm development in encouraging rat-running through Onslow Village, which is already highly congested in rush hour due to this practise. The A3 congestion caused is likely to cause people to seek alternative routes to the A31 and that means going through the Village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/1146</th>
<th>Respondent: 15274561 / Thomas Davies</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I do not believe this section to be legally compliant as it does not take into account the widening of the A3 which is required to make it viable.

I do not think this part of the plan is sound as

- the impact of the loss of views from the Hog's back is not assessed, in that this damages its character as an AONB
- it will generate additional need for transport capacity that is cannot meet
- it requires a link to be established between the A31 and Egerton Road but does not give any details as to how this can be achieved
- the new A31 junction design will cause traffic to back up to the A3 and traffic to be displaced into Onslow Village. Signalisation will cause significant delays to traffic
- additional traffic generated by 1800 homes will put a major strain on a single point of exit
- location of the junction does not make sense in terms of the local topography for westbound traffic to enter the new development
- no contingency for the A3 widening not being completed is made
- no impact assessment for the A3 widening is included

In general terms:

1. I object to such a large development (1800 homes) encroaching into countryside and destroying rural views from the Hogs Back Area of Outstanding Natural Beauty (AONB). To maintain the character of an AONB it is not sufficient simply to avoid development on the site itself. What makes it an AONB are the uninterrupted views both north and south.
2. I object to this plan for Blackwell Farm being proposed separately to the A3 widening scheme. The viability of the plan depends upon sufficient A3 capacity being delivered and the whole environmental and traffic impact must be considered together.
3. I object to the widening of the A3 that is implied and required by the Blackwell Farm development. The noise levels and pollution from the current A3 are already very substantial for residents of Onslow Village. Much of the Arboretum is spoilt by the level of existing noise. The New Local Plan contains no details on how to mitigate the additional noise and pollution caused by widening.
4. I object to the plan for adding a signalised junction serving the Blackwell Farm development on the A31. The location of this junction will cause traffic to back up on to the A3 and therefore cause tailbacks all through Guildford southbound, which are already very large. The A31 slip road from the A3 can only be enlarged by rebuilding the bridge over the A3 which is not part of this plan. Therefore the plan does not manage the impact of this junction.
5. I object to the likely impact of the Blackwell Farm development in encouraging rat-running through Onslow Village, which is already highly congested in rush hour due to this practise. The A3 congestion caused is likely to cause people to seek alternative routes to the A31 and that means going through the Village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): (No)</td>
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</table>
The consultation does not include the impact of the A3 widening. A3 widening is required for the viability of the Blackwell Farm development and should be considered in conjunction.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/484  Respondent: 15274561 / Thomas Davies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The plan is not sound as it does not consider the full impact on residents of Onslow Village of the combination of the Blackwell Farm development and the A3 widening.

It is also not sound as it does not consider the impact of the Blackwell farm development on the character of the Hog's Back Area of Outstanding Natural Beauty. It is also not sound because it makes insufficient, inadequate and inappropriate provision for traffic and will worsen the A3 issues identified in the Guildford Borough Transport Strategy 2016.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/488  Respondent: 15274689 / Rebecca Brackley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

I object to the removal of Horsley from the green belt as this will be detrimental to residents' quality of life. Open spaces are important for health and well being. It is unacceptable for our villages to become part of the urban sprawl.

I object to the plan due to the lack of infrastructure in this area. Our schools are already over subscribed, the medical centre does not appear to have any more capacity (rooms for medical staff, parking etc) and our roads are already inadequate - they are narrow in places, with poor drainage and poor surfaces. The traffic is also heavy at peak times. The area already floods at times and more development will just make that worse.

I object to and disagree with the numbers of houses needed. I believe the approval of sensible very small scale developments and renovation of existing unused properties would be adequate for the needs of the village.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1150   Respondent: 15274721 / Ann Bourne   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I believe the plans to build over 1000 houses and a school in such a small village is far too ambitious for such a small community. The key reasons are that the land in question is largely in the green belt (a precious commodity that must be guarded), the surrounding roads and village infrastructure cannot possibly support such major growth in our village, and there would be a significant and very sudden change to the nature of Normandy and Flexford. I am not against development, and those small housing developments which have taken place in the nearly 30 years we have lived here have been delivered effectively and without a major jarring impact on either community or infrastructures. Building on land that has come available - to fill in when a pub has closed, or a small church has been taken down, or after the rebuild of the village hall - have meant that probably in the region of 40 new homes have been added and welcomed into our community. However, this level of development will fundamentally change our home, and will completely overwhelm our roads, our surgery, our churches and change a tranquil rural neighbourhood into a bustling suburban space. It is insensitive and unnecessary.

Ann Bourne

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3585   Respondent: 15274785 / Jon Hassell   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I have seen the recent plans for expansion of housing in East Horsley and surrounding areas, and have serious objections over the proposed plans. I struggle to accept that all the proposed areas in this draft plan would not severely negatively impact our village, its community and facilities.

I moved into this area because I wished to move into a village community. I do not wish for it to now become a town. The local amenities are only just enough to support the current village community - I have deep concerns about the lack of amenities being proposed to support such a large increase in housing, being schools, roads, drainage, trains, parking, to name a few. Even if these were to be improved to cater for a larger population, it will change the whole essence of living the village.

The land adjacent to my house (Weston Lea, area 1275) is currently used by our children's primary school, The Raleigh, for sports. Are we to assume the facilities for the local primary school are to be decreased to make way for more housing?! I would have thought it wiser to try to increase the school facilities, not the opposite!

In addition, I believe the land is currently left free to allow itself for being used as a flood plain. If housing is allowed in this area, I would need confirmation that any flood damage would be insured for and compensated for by the council, if it in any way impacted my house.

In summary I object to the following key issues:

1) **Schooling** - the current primary school is already over subscribed - I cannot see sufficient measures to support the increase in number of children that will need schooling in this area. This is also true of secondary schools - the Howard of Effingham School is also at capacity.

2) **Flood risk** - the flooding and surface water levels in this area are already of serious concern, and more housing will obviously seriously exacerbate this problem. I do not see sufficient measures are being proposed to address this.

3) **Medical Facilities** - again, already at capacity for this village - what measures are being taken to increase this facility?

4) **Transport, roads, parking** - the train service from Horsley would need to vastly improve, longer trains, more frequent trains, more parking for commuters. With a possible 6000 additional cars frequenting the local roads, the impact on roads and parking will be tremendous. The parking for the local shops, medial centre, & village hall will be over stretched. The roads are already in such poor condition that the increase in traffic will only make this worse. It looks from the plans in the SCC report that "further thought may be required to managing traffic" - this is an absolute necessity, not an afterthought!

I hope you can consider these objections, and come to the logical conclusion that this Draft Plan is insufficiently prepared, and cannot realistically be condoned, as it will have a huge negative impact on the local area in both short and longer term.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/1155  **Respondent:** 15274817 / Mike Partridge  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2016).

I wish to register strong objection to this proposed submission Local Plan primarily because it removes the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). Removing the protection of the Green Belt is likely to result in unnecessary urban sprawl between Woking and Guildford. I believe there are no special circumstances which justify these villages being removed from the Green Belt.

I also object to the Local Plan because I believe that the proposed additional 13,860 new houses is not sustainable. The local communities of Ripley, Send and Clandon don’t need these houses and the Wisley Airfield (A35) and Garlick’s Arch (A43) sites have no infrastructure, no railway stations and inadequate bus services. This development would result in large numbers of extra cars and car journeys in these areas. This, coupled with the narrow rural roads and no pavements is likely to make the lives of many local residents a misery.

I object to the development at Garlick’s Arch which would result in the loss of four existing successful rural businesses, which have operated successfully there for some considerable time employing local people.

The proposed Local Plan lacks provision for satisfactory improvements to infrastructure for the sites (Policy 11). Local services and utilities are already near to, or at, capacity and there is no provision to improve Clinics and other key public services to cope with the huge increase in houses.

I object to the Local Plan because of the substantial increase in traffic that is likely on the trunk roads i.e. A3/M25. I understand that Highways England have no plans to even start to consider improving the A3 before 2020.

For these reasons, I believe that the developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), should not take place.

I'm commenting from outside the immediate area affected by the Local Plan because I feel strongly that these proposed developments will not only result in considerably increased overcrowding of the commuter services into London, which are already close to capacity during peak hours, but also to the loss of quality open areas, with public access, in this part of Surrey.

I wish these objections to be fully taken into consideration and urge you to amend the Local Plan accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2260  Respondent: 15274817 / Mike Partridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2016).

I wish to register strong objection to this proposed submission Local Plan primarily because it removes the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). Removing the protection of the Green Belt is likely to result in unnecessary urban sprawl between Woking and Guildford. I believe there are no special circumstances which justify these villages being removed from the Green Belt.

I also object to the Local Plan because I believe that the proposed additional 13,860 new houses is not sustainable. The local communities of Ripley, Send and Clandon don’t need these houses and the Wisley Airfield (A35) and Garlick’s Arch (A43) sites have no infrastructure, no railway stations and inadequate bus services. This development would result in large numbers of extra cars and car journeys in these areas. This, coupled with the narrow rural roads and no pavements is likely to make the lives of many local residents a misery.

I object to the development at Garlick’s Arch which would result in the loss of four existing successful rural businesses, which have operated successfully there for some considerable time employing local people.

The proposed Local Plan lacks provision for satisfactory improvements to infrastructure for the sites (Policy 11). Local services and utilities are already near to, or at, capacity and there is no provision to improve Clinics and other key public services to cope with the huge increase in houses.

I object to the Local Plan because of the substantial increase in traffic that is likely on the trunk roads i.e. A3/M25. I understand that Highways England have no plans to even start to consider improving the A3 before 2020.

For these reasons, I believe that the developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), should not take place.

I wish these objections to be fully taken into consideration and urge you to amend the Local Plan accordingly.

I'm commenting from outside the immediate area affected by the Local Plan because I feel strongly that these proposed developments will not only result in considerably increased overcrowding of the commuter services into London which are already close to capacity during peak hours, but also to the loss of quality open areas, with public access, in this part of Surrey.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/1151</th>
<th>Respondent: 15274849 / Bryn James</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I wish to object in the strongest possible terms to planning site allocation A46. The reasons for my objection to this specific allocation are that I know this site well as I live in very close proximity to it and the arguments put forward to the development by Guildford Borough Council are erroneous. I am sure that you will have received a good number of objections to this application, as the grounds for the application are erroneous in many ways, but I wish to add my comments that the application is absolutely wrong in stating that an additional school is required in the area. I am involved in local education (albeit at higher level, but I am knowledgeable with regard to secondary education) and I know for a fact that local schools are currently facing an UNDERSUBSCRIPTION for several years into the future. An additional school in the area of application A46 is absolutely not required.

I also wish to object most strongly on the grounds of sustainability and sensitivity. I am aware that Guildford Borough Council is currently supporting work at the University of Surrey's Centre for Environmental Strategy (CES) (which is an internationally acclaimed centre of excellence in sustainable development) and that this proposal (Application A46) is in direct conflict with the findings, so far, of this work. To precis a substantial volume of work (by professionals who are much more capable than I) in sustainable, energy/social/transport development, the development needs to grow organically, not be developed by the plans of a developer (which A46 is clearly is).

I understand and support the need for development of affordable housing, to support the needs of a developing Guildford. However, Guildford Borough Council is, in Application A46, proposing an unsustainable encroachment on the green belt, driven by an ill-considered plan by a developer. Guildford Borough Council, by proposing Application A46, is losing the opportunity to develop a sustainable and sensitive development that could benefit the local community and deliver a good number of affordable houses if planned sensitively and in keeping with the local environment and geography (which is subject to flooding).

There are several other factors which render this Application inadmissible, including that it fails to meet the National Planning Policy Framework, it is a threat to the Thames Basin Heath Special Protection Area and the local traffic infrastructure cannot cope with the current traffic density. The latter point is a current issue of contention in that traffic through Normandy is already taxing the capacity of the road infrastructure. The proposed application A46, proposing 1100 new homes, will completely overwhelm the road system, which CANNOT be improved due to the critical limitations of the bridges on Westwood Lane (road goes under railway) and Glaziers Lane (road goes over railway). A consideration of funding for improving these bridges has been included in Application A46, but this is woefully and very considerably inadequate. As a professional engineer I am conversant with the cost of bridge improvement and I know that the value considered for such improvement in Application A46 is only a tiny fraction of the sum that would be needed to enhance the throughput of either/both of these bridges.

In short, the proposal in Application A46 is not sustainable, goes against the requirements of sensitivity and cannot be cost effective. If actioned it will degrade the lives of current inhabitants of Normandy and will create poor living conditions for any eventual residents of the development. It will degrade the green belt, which will never be able to be recovered. It goes against the findings of world class research currently funded by Guildford Borough Council at the University of Surrey. I object most strongly to this development.

Regards

Prof Bryn James

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored. I urge the council to look more imaginatively at use of brownfield land. For example, much land currently used as retail is likely to become vacant in the years to come.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the building of any homes in this Green Belt area which has a lovely rural character. I live in the London/Surrey borders and often come out here walking. I am a keen birdwatcher and nearby Ockham heath has valuable, protected wildlife such as nightjars. I have been on evening walks on Ockham heath to see nightjars with the Surrey Wildlife Trust. A forward-thinking council would be working with Surrey Wildlife Trust not just to protect surroundings areas from development, but to expand Ockham heath and turn the ‘airfield’ back to heathland as it once was. Already a huge amount of this internationally valuable habitat for wildlife has been lost. An estimated 80% of all the UK's lowland heathland has been destroyed (source: RSPB). This is valuable for wildlife but walking in this lovely area also improves my quality of life, physically and mentally. Surrey needs to protect its countryside as an asset not build new homes in completely inappropriate places. I am also a regular visitor to the Black Swan as our cherished country pub. With this development it would be a ‘country pub’ no longer.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs. It is wholly inappropriate, thought up by a faceless developer who I understand is acting through a Cayman Islands company, removed from public scrutiny. The developer should be ashamed of this way of acting, hiding from the public, which shows that pure profit is their motive. It is greed and the pursuit of short-term profit. If this development is permitted we will only realise the damage that has done after it is too late and the special rural character of this part of Surrey (just about clinging on after the A3 and M25 have been driven through) has been destroyed.
- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. This is simply not credible. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads. This has pollution and climate change impacts. Surely the council has a duty to site major new developments in areas served by public transport?

3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements

4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)

5. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

- I object strongly to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCl). An estimated 80% of all the UK's lowland heathland has been lost (source: RSPB). Surrey has much of what remains. Ockham/Wisley heaths have already been cut in two by the A3 and M25. It would be extraordinarily destructive to build a huge new housing development next to what remains. The council should be working to enhance what is left. A forward-thinking council would be working with Surrey Wildlife Trust to convert the old airfield back to heathland as it once was.

- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

- I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

In summary, it is wholly inappropriate to build this size of development on this greenfield, green belt site. I am surprised that this site remains in the strategic plan. To an outsider, it appears to be yet another case of a greedy developer (in this case acting through a Cayman Islands company away from public scrutiny and through cowardly anonymity) bending a council’s ear to persuade the council that short-term financial gain should be placed ahead of a sensible, sustainable future for this area that will preserve its character and enhance the life of residents and regular visitors such as myself. I urge the council not just to remove this site but to work with organisations such as Surrey Wildlife Trust and the RSPB to prevent more damage to Surrey heathland and work to restore what has already been destroyed.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

As a Surrey resident keen to protect the rural character of a dwindling portion of our county, I am dismayed that the council is proposing to support development in so many Green Belt areas and on sites that are wholly inappropriate for large housing developments. The Green Belt and countryside study seems to take as a fait accompli that much of the green belt should be built on without proper consideration of alternatives. In my view, and I attach much of the blame for this not to the council but to unscrupulous developers using dubious tactics in the pursuit of financial gain (such as the use of Caymans Island companies - Wisley airfield) the council has failed properly to consider how brownfield sites could be developed. It has failed to look ahead and realise that many out of town shopping centres will close in coming years as people continue to do more shopping online. It has failed to realise that the rural character of areas like Ripley, Send and Ockham are an asset to the county that will be destroyed by the developments it appears to be prepared to sanction. The council has failed also to take account of its responsibilities to protect wildlife. Surrey has a large proportion of the UK's remaining lowland heathland, 80% of which has already been lost. The council should be working to preserve this, not destroy it. Yet I see little consideration of this in the documents I have seen. This plan does not present a vision of a sustainable future that will preserve the quality of life of Surrey residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | SLP16/497  | Respondent: | 15274913 / Simon Osborn  | Agent: |
|-------------|------------|-------------|--------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

No, I do not consider the plan to be sound. It appears to be a statement of desperation to meet wholly unrealistic imposed from central government that are wholly unsuited to the Guildford area. I am a Surrey resident who is a frequent visitor for leisure and recreational purposes to many of the areas that will be affected by this plan I walk on Ockham and Wisley heaths and enjoy the scenery and wildlife, I go birdwatching on Papercourt meadows and on Bookham Common, I go for country walks around Send, Ripley, Wisley and Ockham. I have been on Surrey Wildlife Trust evening walks on Ockham heath. With my family we visit Ripley, Wisley and Ockham for shopping, eating and drinking and regularly frequent many of the National Trust properties such as Hatchlands and country pubs such as the Queens Head in East Clandon and the Black Swan in Ockham and restaurants and pubs in Ripley. I therefore spend a lot of money in this area and support local businesses and employment. To me this area has a special rural character that must be preserved when so much in Surrey has been lost. I want my children to enjoy this too.

I am staggered by the scale of many of these proposed housing developments on what are wholly inappropriate rural and Green Belt sites. Even a small number of these developments would completely destroy the character of these villages and surrounding countryside. I am talking particularly about the proposed developments for Ripley, Send, West Horsley, Clandon Ockham and Wisley. The Green Belt and Countryside Study seems to take as a fait accompli that much of the green belt should be built on without proper consideration of alternatives. The draft plan fails properly to consider how brownfield sites could be developed. It fails to realise that the rural character of areas like Ripley, Send and Ockham are an asset to the county that will be destroyed by the developments it is prepared to sanction. The council is failing also to take
account of its responsibilities to protect wildlife. Surrey has a large proportion of the UK's remaining lowland heathland, 80% of which has already been lost. The council should be working to preserve this, not destroy it, and to restore what has been destroyed. It should be seeking to place housing developments in areas with strong train and bus links: yet 2000 homes could be built at Wisley far from train stations and bus routes. This matters for the quality of life of residents and visitors, not for wildlife. On the fringes of London there is huge demand for quality, attractive green space that benefits humans and wildlife.

In particular, I urge the Council to remove the following sites from the strategic plan as wholly inappropriate in scale and siting given the Green Belt and rural character of the following areas which I visit regularly:

- Site A35 - the former Wisley airfield. To put this development here would be a wanton and inexcusable act of destruction, unjustifiable on social, economic or environmental grounds.
- Sites A37, A38, A39, A40, A41, A42 and A43

Yet this draft plan does not present a vision of a sustainable future that will preserve the quality of life of Guildford residents or visitors. It appears a forced exercise to comply with national targets, spurred by greedy developers working for short term financial gain. I urge the borough council to stand above this and amend the plan to remove Green Belt and rural areas from development that we would all come to regret. This plan is not a forward-looking, sustainable vision but a blueprint for local desecration driven by national targets that fail to take heed of what matters on the ground to local people. I am disappointed that the council does not appear to recognise that the rural character of Send, Ripley, Horsley, Clandon and Ockham is special, worth protecting and important to many local residents and visitors. There are also important wildlife sites in these areas that would be adversely impacted by this developments that would be nails in the coffin for Surrey countryside. But it is not too late to make important amendments. I urge the council to have the courage to stand up for what is right, resist pressure from Westminster and make significant amendments to remove many of these rural housing developments from the draft plan. This is essential to protect our future quality of life and to protect the Surrey countryside and wildlife.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Measuring transport **Monitoring Indicators** every ten years is not in my opinion adequate. This should be done at more regular intervals.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** SQLP16/514  **Respondent:** 15274945 / Philip Grainger  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have made two specific comments on the plan, but wanted to say that in general it seems very reasonable and well thought through. I feel that it is time something happened to provide more housing and infrastructure in Guildford. Without additional housing, my children will have to move away from the area which we have been so lucky to be able to live in. I wish you all the best with this difficult consultation!

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/1163  **Respondent:** 15274977 / Robert Hilton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A22

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Not enough school places!!!

Having lived near that area only last year, I can tell you (as if you need telling), that there are not enough primary school places. We lived on Cumberland Avenue and my son got offered his 14th closest school........in Woking!!

You know there are not enough so what have you done about it?
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1164  Respondent: 15274977 / Robert Hilton  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A23

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( Yes ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Sound like a good idea

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1251  Respondent: 15274977 / Robert Hilton  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Shouldn't be building on green belt, too much extra traffic in burpham and doubtful enough school places going forward!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/746  Respondent: 15275009 / Compton Parish Council (Fiona Curtis)  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Compton

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
The maps have different ratios, which can be rather misleading in terms of comparing one with another.

The map for Compton suggests that the dotted pink line is the boundary line for the village when in fact this is just the village settlement area. The wider village includes Priorsfield Road and The Avenue and Down Lane and parts of New Pond Road and the Hog's Back and Blackwell Farm, all of which are missing. Common land should ideally be marked up. Blackwell Farm is currently shown on a map called 'Guildford Urban' which of course does not exist and hence this could be misleading.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPS16/1156</th>
<th>Respondent: 15275009 / Compton Parish Council (Fiona Curtis)</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? (No), is Sound? (No), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

**We object to the inclusion of Blackwell Farm in this Local Plan, for the following reasons:**

- The southern slopes of the Hog's back are AONB and views in and out of that area should be protected and this is not possible if the development goes ahead.
- Blackwell Farm has recently been assessed by an independent expert as being of AONB quality and we anticipate that it will be included within the Surrey Hills AONB as part of the forthcoming boundary review.
- The South Downs is National Park and there has been a call for the North Downs to be considered in the same light. This would make Blackwell Farm a great asset to Guildford and a tourist attraction (particularly as it is home to one of the few Model Farms in the South East) and would fit in well with the rural ventures such as Greyfriars Vineyard, Mane Chance horse sanctuary and Watts Gallery, all of which are in close proximity.
- Blackwell Farm is very effective in fulfilling the functions of Green Belt.
- Blackwell Farm land which has been categorised as the best and most versatile (Grades 2 and 3a) and there is strong demand for local food production.
- More people objected to the inclusion of this strategic site than to any other strategic site, its inclusion is not supported.
- The 4-way access to the site on the A31 (Hog’s Back) is highly unlikely to be viable, and would harm to the AONB for miles (due to the need for lighting and its elevated position). The suggestion that rat running could be deterred through the use of automatic number plate is unrealistic. What about visitors and deliveries and changes of vehicle? Likewise, a barrier would cause chaos and possibly increase the volume of traffic wishing to use the A31. If no restrictions were put into place, the route will become a rat run, then there is nothing from stopping traffic on the A31 from using it if it is indicated as the shortest route. If the A3 were congested traffic could also come off at the Compton roundabout and take this route via Down Lane, which would add to congestion in this busy village and would negatively impact the tranquil lane, which is the home of Watts Gallery and Chapel. See annex 4.
Maps, tables and results from assessments such as traffic impact all refer to the Blackwell Farm site as in "Guildford urban area" and refer to non-existent boundaries as if they are current. There is nothing urban about this area of countryside as the independent landscape assessment reveals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Site 26 BWF Annex 4.pdf (456 KB)

Comment ID: PSLPS16/1247  Respondent: 15275009 / Compton Parish Council (Fiona Curtis)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

We object to policy A26 Blackwell Farm There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints. Blackwell Farm is located entirely within the green belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Blackwell Farm performs all five functions of green belt, and fulfils purposes 1, 3 and 5 very strongly. Purpose 1 - "checking the unrestricted sprawl of large built-up areas". There is huge pressure to develop on the western edge of Guildford; the University of Surrey has stated publicly that its key objective is to develop the whole of its landholdings, stretching west to Flexford Farm. This, combined with the indefensible boundary being proposed (a hedgerow rather than the existing belt of ancient woodland), will put more of the green belt and the Surrey Hills Area of Outstanding Natural Beauty (AONB) at risk of future development. Purpose 3 "assists in safeguarding the countryside from encroachment" - the proposed movement of the green belt boundary on the west of Guildford to allow for development of the University in 2004 resulted in the encroachment on countryside and the loss of working farmland (including some Grade 2) at Manor Farm. The proposed future change in the boundary would result in further encroachment and the loss of farmland including further Grade 2. The proposed road development with access road from the A31 would also effectively cut off farm access to the south of the development area leading to further urban influence on this countryside. The University’s stated key objective is to develop land, which includes Chalkpit and Wildfield farms leading to the risk of further boundary change and further encroachment in future years. Purpose 5 - “assists in urban regeneration by encouraging the recycling of derelict and other urban land”Whilst all green belt assists towards this purpose, the ownership of this land by the University of Surrey with its extensive landholdings within the urban boundary (including land it leases to the Hospital and Holiday Inn, the Surrey Research Park, Hazel Farm as well as two large campuses) means that the location of Blackwell Farm within the green belt plays an even greater and direct role in encouraging the more efficient usage of urban land. Stopping development on Blackwell Farm would result in the University of Surrey investing in, and regenerating, land in its ownership and delivering its commitments following the 2003 boundary review (including 270 homes for key workers, 3,125 student residences and releasing further accommodation at Hazel Farm). The University has 17 hectares of surface car parking that could be built over with offices and flats. This is a more sustainable option than building over open farmland (largely grade 2 and 3a) within the green belt. The Blackwell Farm development would result in harm to the Surrey Hills Area of Outstanding Natural Beauty (AONB), harm to an Area of Great Landscape Value (AGLV), and harm to the setting to the AONB. (Blackwell Farm forms the views into and out of the Hogs Back ridge). The NPPF is clear that AONBs should be afforded the highest level of protection in relation to landscape and scenic beauty. All development proposals within and adjacent to the AONB must conserve or enhance its special qualities. The NPPF also makes it clear that applications for major development in the AONB will be refused unless exceptional circumstances are demonstrated and the development is proven to be in the public’s interest. Guildford Borough Council has not shown that the proposed housing development or the extension of the Research Park, or the proposed link road from the A31 to Gill Avenue, is in the wider public interest. Indeed, the increased traffic through the already congested Egerton Road/Gill
Avenue junction, which would result from the development, would impede emergency vehicles travelling to the Hospital and this would be very much against public interest. GBC’s Policy P1 states that, “The Surrey Hills Area of Outstanding Natural Beauty (AONB) will be conserved and enhanced to maximise its special landscape qualities and protect it from inappropriate development. All proposals will be considered against whether they conserve and/or enhance the setting and views of the AONB”. I question how the proposal to carve a new two-lane carriageway through the AONB fits this policy, or meets para 115 of the NPPF? Finally, nearly the whole site has been identified as a “candidate area” for AONB status in the Landscape Evaluation Study commissioned by Compton, Worplesdon and Wanborough parish councils. Therefore, the entire site should be treated as though it is within the AONB during this local planning process. The access to the proposed Blackwell Farm site will put additional peak hour pressure on two of Guildford’s worst congestion “hot spots”: the A31 (Hog’s Back) and the Tesco Roundabout on Gill Avenue. See annex 3. GBC’s proposal to create a new major route into Guildford from the west at, or close to, the Down Place private driveway, and to make this the main access to the planned Blackwell Farm development, does not appear to have been thought through. There are queues stretching back from the Farnham Road Bridge as far as the Down Place driveway entrance most weekday mornings and any traffic generated by the new development would not be able to clear the junction. In order to accommodate the volume of traffic using the new junction (generated by residents of the new housing estate, employees at the Surrey Research Park, Hospital and University, and visitors to the new school/supermarket), there would almost certainly need to be a roundabout (rather than the proposed traffic-light controlled junction) and GBC has ruled out a roundabout on grounds of landscape impact and traffic. The secondary access to the site at Gill Avenue also presents problems, and as GBC states in its Transport Assessment (14.9.5), changes planned for the Tesco roundabout will not mitigate against the increased level of traffic through the junction as a result of the Blackwell Farm development, and this in turn will impact on the Egerton Road/Gill Avenue junction, which serves the Royal Surrey County Hospital. I question whether it is responsible to allow a development that would impede emergency access to an A&E department and a major incident unit. The traffic impact resulting from the development of Blackwell Farm on the strategic road network would not appear to be properly assessed but it would be alleviated in part (but not completely) by widening the A3. However, timing and funding for this work is unclear so there would be many years of traffic chaos before any widening took place (if indeed it does). More significantly, the widening of the A3 would create noise and environmental impact on the neighbouring residential areas of Onslow Village and Beechcroft Drive and a six-lane highway would cause greater severance between Guildford and Blackwell Farm and areas to the west. The NPPF states in Section 6 para 47 that local authorities should “identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15”. It further adds, “To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.” I consider that the proposed access arrangements to Blackwell Farm are wholly inadequate for a development of this scale and thus the site cannot be “viably developed”. See annex 4

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  
[Annex 1 - Hogs Back Natural Beauty Evaluation V2 24.05.16.pdf](5.9 MB)  
[Site 26 BWF Annex 4.pdf](456 KB)
POLICY A55

We object to the removal of land from Greenbelt for the provision of two traveler pitches on Puttenham Heath Road to ‘enable delivery’. The area warrants Green belt status and should remain in Green Belt. Removal is a big step towards the eventual development of permanent accommodation, which would result in loss of the two pitches.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2280  Respondent: 15275009 / Compton Parish Council (Fiona Curtis)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Policy D2 Sustainable design, construction and energy. Sustainability should be an overarching ambition, conditioning the whole local plan and running through it, as claimed in the NPPF, “like a golden thread”. It should be set out clearly in Policy S1, and not presented as a minor detail in Policy D2. This policy amounts to “greenwashing”, expounding aspirational environmental targets while ignoring the plan to build dormitory towns across the Green Belt that are environmentally and socially unsustainable. These settlements will bring vastly increased car use and will lead to unacceptable traffic congestion, overstretched social infrastructure, and more greenhouse gas emissions, noise and light pollution. This policy should not be just about saving energy but about preserving the borough’s stock of natural capital, especially the countryside, from attempts to manipulate the housing market. This policy’s emphasis on Combined Cooling Heating and Power and communal heating networks is difficult to understand, since no such networks are available locally.

There is also no mention of future proofing homes for older people so that they may maintain independent living within the home. The implementation of technology that will permit telecare or telemedicine is perfectly achievable given the high level of broadband in Surrey.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2281  Respondent: 15275009 / Compton Parish Council (Fiona Curtis)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to policy D3 Historic Environment. This policy clashes with the strongly pro-development agenda of the rest of the plan and fails to address the contradiction. History is unamenable to improvement, so the policy should commit the Council firmly to protecting and preserving our heritage assets from development. Instead, the specific policy pledge to “support development” that might “enhance” heritage assets leaves wide scope for abuse in the form of destructive commercialisation and financial leveraging of relevant sites. This policy is based on the premise that Guildford’s heritage is inherently in decay. We feel that the historic environment support and may not necessarily fully pay its way. The policy wording in the blue box leaves many loopholes. Development close to historical assets is harmful and should be expressly prohibited. This policy fails to meet the requirements of NPPF paragraphs 126 and 131-133.

We would also encourage input from historians and those with specialist knowledge for provision of ‘key evidence’.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2282  Respondent: 15275009 / Compton Parish Council (Fiona Curtis)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to policy D4 Development in urban areas and inset villages. The NPPF does not include a definition of ‘insetting’ in its glossary and the definition used by GBC (Where a village is excluded from the Green Belt boundary. Currently the villages of Guildford are washed over by the Green Belt and form part of it) does not explain the rationale behind the choice of villages removed or ‘inset? It is unclear what exceptional circumstances could warrant the removal of Greenbelt from 15 villages in one sweep? These have not been outlined. The policy lacks clarity and transparency.

This policy that does not address the opportunity for building in the urban area. The plan envisages that 40% of homes built will be “affordable”, but this does not provide any accommodation for low-paid workers, for example, those on the minimum wage, who cannot afford to buy so-called “affordable” homes or pay an “affordable” rent. There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low-paid workers such as those employed in the retail, warehousing and distribution sectors (all of which this plan aspires to expand). The number of homes planned in the urban area is much too low. There is a need for regeneration in many urban areas, particularly Guildford Town Centre but this is ignored in favour of building homes on green-field sites instead. This will not address urban housing needs. It is also unsustainable, since building outside the town does disproportionate harm to road traffic, air quality and overstretched infrastructure. The plan envisages a large expansion of the retail sector, but this is hard to justify.

The landscape character assessment suggested that Blackwell Farm be included in the AONB review, yet GBC excluded it.

A residential Guide from 2004 would be out of date wouldn't it? Technology has come on leaps and bounds since this time.

Blackwell Farm is listed as SW Urban, when it is open and beautiful countryside? This is mis-leading.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2274  Respondent: 15275009 / Compton Parish Council (Fiona Curtis)  Agent:
We object to policy E2 location for new employment floor space. We object to the policy of expanding the Research Park onto Blackwell Farm and I do not believe there are exceptional circumstances to justify incursion into this permanent and high quality area of Green Belt. The Surrey Research Park currently extends to 65,000 sq m. There is already granted consent to expand to a further 9,000 sq m (14%) The past trend of expansion of Office/R & D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis. The ELNA 2015 calculated annual floor space demand is 0.7%. The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period. The necessary growth in floor space over the plan period is therefore 17 years x 0.7% = 11.9%. There is currently 14% expansion space already available. The proposal by GBC to expand the 65,000 sq m by 9,000 sq m (existing allocation) with an additional 35,000 sq m amounts to an increase of 67% of the Research Park which is not required. The Research Park is currently developed at a density of 25% plot ratio. The majority of existing buildings are 2 stories giving a developed floor space plot ratio of 12.5%. The existing Research Park has the opportunity to markedly increase its density without infringing any Green Belt land nearby. Any density increase would be cost effective for the use of all existing infrastructure and would also have the potential to match the existing densities of existing academic buildings on the university campus which are three to four times higher. Together with the existing expansion of 14% through existing consents and the opportunity to increase its density the Research Park has ample capacity to expand to embrace new demand for B1b uses linked to the university. A preferred location for increased B1a and B1b space would be in the Town Centre close to housing and a convenient transport hub.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2275  Respondent: 15275009 / Compton Parish Council (Fiona Curtis)  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to policy E4 Surrey research Park.

We support the maintenance of research, development and design activities, in any science, including social science, that is complementary to the activities of the University of Surrey at the Surrey Research Park. We object however to the completely unnecessary expansion of the Research Park into a larger Business Park. We believe that the planning policy going forward for the Surrey Research Park should be to maintain and enhance the integrity of its research base allowing for the economic value add to the local economy of knowledge and technology transfer from the University. We believe that B1b (should be the primary use class for the Research Park and that applications for B1a should be resisted due to the danger of dilution of the core purpose and reputation of the park. We object to the inclusion of B1c uses which is inappropriate and unnecessary.
Research parks based on the early UK technology transfer exemplars of the Cambridge and Oxford need careful
monitoring, nurturing and protection to ensure the integrity and quality of the park is maintained and the park continues to
be a destination for innovation and enterprise. There is a danger for research parks to be overwhelmed by short sighted
development opportunities being taken by park managers provided by standard office activities and administrative
functions which in time turn them into standard business parks which can be found anywhere in the country. Their relative
low density and attractiveness make them targets for “any other” office user Research parks that lose their way stop being
the location of choice for new innovative enterprises. We hope the Surrey Research Park in Guildford remains focussed on
a broad spectrum of scientific research including computer science, bio-chemistry, design, space-science, eco-science,
health science, software development, laser technology, media-science, artificial intelligence, robotics and super-
manufacturing.

Monitoring indicators should include new start-ups and new patents created Facilities should be provided whereby new
small businesses can secure premises under subsidised licence fee arrangements with no onerous rent or lease
commitments We support the idea of a variety of sizes of unit including some small units (between 15 – 80 sq m) bearing in
mind one workstation is 10 sq m Consideration should be given to the concept of shared “enterprise hubs” where
individuals can take pay as you go workstations in shared spaces similar to touch down business centres similar to the
“enterprise village” concept.

We object to the policy of any new extension of the research park more than the existing 14% already provided for within
the park or within the footprint of the park The Surrey Research Park currently extends to 65,000 sq m There is already
granted consent to expand to a further 9,000 sq m (14%) This space has been available for 10 years and is still to find a
taker The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015
derived from VoA analysis The ELNA 2015 calculated annual floor space demand is 0.7% The data point for our analysis is
today in 2016 so we have 17 years to go to the end of the plan period. The necessary growth in floor space over the plan
period is therefore 17 years x 0.7 = 12% which is less than the current expansion space of 14%. The research park is
developed at a plot ratio of 25%. This could be increased to 50% within the same footprint of the existing park without
damage to its amenity. The actual current land use for development in the park is in fact only 12.5% because most
buildings are 2-storey.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
unworkable. The results of the consultation were not publicized but were instead collated and summarized and bore no resemblance to the submissions we had sight of.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2277  Respondent: 15275009 / Compton Parish Council (Fiona Curtis)  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to policy E6 the leisure and visitor experience. We believe that the importance of a visitor attraction hub could be much better articulated. Guildford has great potential to become a “must see” destination for tourists and visitors. Surrounded by the natural beauty of the Surrey Hills, it is already distinguished as an historic county town. The historic part of the town should be exploited to the full creating a real sense of vibrancy and atmosphere. This should be linked to the attractions of the Museum, the Castle, the Wey and the historic High Street including its views of the Hogs Back. The economic impact would create big advantages for both the leisure and the niche speciality retail sectors in the town. Given the local and wider catchment of the town Guildford should strive for high quality definition making it a great centre for people to live in and visit. Guildford the historic “Gateway to the Surrey Hills” has far more potential than Guildford just any other stereotypical centre found anywhere around London. Re-branding walks, such as a new “Pilgrims Trail” similar to the Patriots trail in Boston USA with marked yellow footsteps leading from the station to the River and up through the historic heart of the town.

There is a need to make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms. There is a need to help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Watts Gallery or Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently bypass Guildford to go to Bath, Oxford or Cambridge instead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2279  Respondent: 15275009 / Compton Parish Council (Fiona Curtis)  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( )
We do not consider that the target of 1,172 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core by increased economic impact. What the town centre needs in terms of urban regeneration and to attain a thriving night time economy is more residential development. The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015. The reality is that the Town Centre and other areas of brownfield in the borough has the capacity to provide significantly more than this.

The omission of the Town Centre Master Plan impacts the soundness of the entire plan as the town is the most sustainable place in the Borough yet it is omitted? Changes to make Guildford more pedestrian friendly by reducing road capacity will impact surrounding areas, yet this has not been built into any Highways Assessments, which already reveal that development will cause congestion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

We object to policy H1 Homes for all.

Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set any rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions. The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated. We support higher density development but not high-rise development (ie over 10 floors) in the urban area close to transport hubs to facilitate modal shift e.g. 20 minutes’ walk of Guildford railway station. Student accommodation should provide for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. We do not understand what appears to be “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and underused surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back. Surrey University has 17 ha of car parks that could provide all the student accommodation required above it, with parking beneath. Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Overprovision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
We object to policy H2 Affordable homes. “Affordable” homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that these homes will remain well beyond most people’s means and that starter homes will not become available for local people. In addition, the viability clause (4.2.40) means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. Building more homes in Guildford cannot increase real affordability given the overhang of the London market.

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Even after the 20% reduction, these 'affordable' homes (using average prices and wages for the area) will be ten times the average salary! Given the level of infrastructure that has been earmarked for delivery by developers the affordable housing is unlike to be built at the levels put forward and may not be produced at all.

The term 'affordable' is also misleading in areas such as Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
We object

This policy says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix”, this can include “market” housing – i.e. normal commercial development which in Guildford usually means expensive executive homes. This policy means building anywhere, and ignoring all historic planning restrictions. The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2283 Respondent: 15275009 / Compton Parish Council (Fiona Curtis) Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to policy I1 Infrastructure and deliveryMost of the borough’s infrastructure is straining to accommodate current needs and organic growth, yet this plan’s commitment to building housing estates across the Guildford countryside will mean either major infrastructure investment that massively under-funded or an implosion as transport, educational, medical, energy, water and communications services become simultaneously overloaded. The plan targets greenfield sites – requiring heavy infrastructure investment – in order to generate CIL income necessary to meet an infrastructure shortfall that is already serious. The current draft CIL scale also encourages development on greenfield sites rather than brownfield and will reduce or negate developer's obligation to sell a percentage of homes at 20% below market value. The policy wording says nothing about roads and traffic. The Council’s methodology for assessing infrastructure needs in this area is inadequate, identifying only the tip of an iceberg of existing congestion. Compton Village is already close to tipping point, yet it will see a significant increase in traffic volume, will be completely congested and yet no plans exist to mitigate the problem. The schemes referred to in this policy barely solve existing congestion and are inadequate when development takes place. The full impact on local road networks has not been fully considered. Some proposed development locations would require highway schemes that involve demolishing property and road-widening in residential areas to solve the resultant congestion. The A3 improvements are not guaranteed to take place but they are being used to justify removing large areas from the Green Belt before detailed traffic assessments have taken place. These detailed investigations are being deferred until the planning application stage and will be left to developers to prepare. If a site then proves to be unsustainable its Green Belt protection will have been lost for no reason and unsuitable development will take place by a more insidious process. Compton Village will actually incur increased traffic flow as a consequence of A3 widening according to the study, yet as was pointed out above, no solutions are in place to improve the situation. Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritising greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself.

Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognising this as a key issue, the plan makes too many assumptions, not least being the verbal
promise that development will not take place without infrastructure preceeding it. It is not clear how this will happen and is not in the Plan, as it should be, if it is achievable. The highways network is under stress at peak times in many parts of the borough. Queuing is the daily experience of drivers going to and from work. The local plan recognises the problems in para 2.14. Much of the road network is single-carriageway, and junctions act as constraints. The key evidence on future traffic conditions is provided in the Strategic Highway Assessment Report (SHAR) which summarises the results of the tests carried out by Surrey County Council at the request of GBC. Five scenarios were examined using SCC’s strategic traffic model. Scenario 1 contains all developments and planning permissions from 2009 to date. As such it corresponds to today’s circumstances, and describes the current unsatisfactory traffic conditions in peak periods. Scenario 5 represents the position at the end of the plan period, including all development and highways schemes in the local plan. The results of the analysis show that there will be widespread congestion in the morning peak hour across the network. The key strategic routes, the A3 through Guildford NE bound, and the M25 between Junctions 10 and 11, are shown to be at or over capacity. The summary network statistics presented in the SHAR, while useful, require some interpretation because the analysis of vehicle-hours is derived from link speeds only, and does not reflect junction delays and queues. The tables that show the ratio of flow to capacity and level of service are especially helpful to gaining an understanding of the conditions on the network in the forecast. Where the forecast traffic volume is above or close to capacity, flow becomes unstable and there is congestion. The SHA results provide evidence that, in 2031, congestion will be worse than it is today on much of the network. It is the case that the traffic modelling does not take into account the potential for increased use of other modes, but the trip rates used for developments already have built in the typical level of use of other modes, and services will be required to meet that need. It is also the case that the model does not allow for park and ride, which would improve matters in the town centre, as discussed below. In order to gain an insight into conditions across the network, it is necessary to combine information from several tables in the SHAR. Table 4.5 shows that the M25 and A3 will be at capacity in Scenario 5. The other roads that will have poor levels of service include those in Table 4.5 but also those in 4.12 (except the A3) and those in Tables 4.3 and 4.4 with levels of service D and E that will not be given some relief by improvement of the A3 in Scenario 5. Paras 4.10.3, 4 and 5 point out that there will be increased congestion. Given that the starting point is unsatisfactory, there can be no expectation that the schemes in the Infrastructure Development Plan will provide an overall improvement. There will be some local benefits, such as the Ash rail bridge for example, but in general conditions will be as bad and in many places, such as Compton Village, worse. So the statement in the SHAR para 4.2.5 that ‘the combined mitigation as reflected in Scenario 5 indicates that at the strategic level it accommodates the additional PSLP demand’ needs qualifying – ‘at the cost of a lot of queuing’ and makes no mention of the impact this will have on pollution, which is already a known problem at the A3 end of Compton. The cumulative effect of the additional traffic generated by the developments in the local plan will be to increase congestion, even with the proposed highway schemes in place. More detailed analysis of the junctions and queuing is required. So we question the conclusion that the developments would have “an acceptable impact on the capacity of the highway networks in terms of the policy test set in paragraph 32 of NPPF”. Appendix 3 of the Transport Topic Paper shows the phasing of housing development and transport infrastructure. The major scheme being considered for the A3 between the A31 and the A320 is scheduled for delivery in the period 2023/24 to 2027/28. The strategic developments at Blackwell Farm and Gosden Hill Farm are shown as being phased in from 2021/22 onwards. The Garlick’s Arch development is shown as starting in 2019/20. Therefore, there will be a period in which the existing A3 has to cope with the additional demand arising from those developments before extra capacity is provided. The following comments regarding the strategic sites are taken from the SHAR: Blackwell Farm – there will be congestion at the A31 junction, and the problems at the Tesco junction, and the Egerton road/Gill Avenue junction (para 4.9.5). Traffic is likely to access the Surrey research park and the RSCH through the development (para 4.7.3) (see annex 4) Gosden Hill Farm – there will be an increase in traffic through Burpham. There will be pressure on the A3100/B2234 roundabout (paras 4.7.6, 4.7.7 and 4.7.8). Wisley – traffic will increase on minor roads to gain access to the A3 (N and S bound) and other routes (para 4.7.11). The development will add more traffic to the A3. The Burnt Common slips help alleviate the traffic through Ripley according to the model, but queuing on the A3 could mean this does not happen (para 4.7.14). Normandy/Flexford – the report has little to say about the impact of this large development. The increase in flow on Westwood Lane is noted (para 4.5.7). Tables 4.10 and 4.11 show junction delay reducing at the Westwood Lane, B3000 junction, but an increasing at the Puttenham Hill/Millbrook junction. Ash – development in Ash is not specifically addressed, but there are major increases in traffic on a number of roads. The new rail bridge will bring relief (but traffic will move to the next junction). Slyfield – there are no remarks relating to SARF, and as there are no additional trips shown in and out of the Slyfield residential zone in Tables 3.3 and 3.4, it is possible that this development has been omitted. There is a significant increase in trips to and from the Slyfield industrial zone, which will impact on the A320 and Clay Lane. Town Centre – the report has very little to say about the town centre. It is evident that the model is forecasting severe congestion on the approaches to the town centre, such as the A281, the A31 Farnham Road, and Woodbridge Road for example. No mitigation measures are planned. And in the Transport Strategy, GBC states that the intention is to adopt Allies & Morrison’s Scenario 2 which would have the effect of significantly reducing the capacity of the town centre road.
system. The implications have not been examined, but traffic using the A281 from Waverley, for example, would be affected.

The B3000 will be severely affected by development schemes and will not benefit from road improvements. It is essential that the impact of all change to road networks are looked at in conjunction with one another for any survey to be meaningful. The local plan does not state an objective for congestion. The two strategic objectives that are included for infrastructure refer to supporting sustainable development and delivering a balanced system. However, in para 2.15 there is an aspiration expressed about opportunities ‘to improve the performance of the road networks through transport infrastructure and service improvements’, which taken with the previous paragraph includes reducing congestion. The evidence so far shows that this will not happen. The mitigation proposed is not sufficient to overcome the problems that will be caused by the level of growth in the local plan. Congestion will worsen. The network will lack resilience and be vulnerable to disruption due to incidents. Minor roads will have to cope with a lot more traffic, for which they are unsuitable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Independent Traffic report annex 3.pdf (2.5 MB)

We object to policy I3 Sustainable transport for new developments This is aspirational, the modal shift aim being worthwhile, but the realities are quite different. The policy fails in its essential job of guiding planning decisions since it assumes development of any kind can be supported by sustainable transport. The sustainability of the dormitory settlements which the Council want to build across the countryside depends on a general “modal shift” from private car use to walking, cycling and public transport. This is unrealistic. The proposed sites are often miles away from the nearest railway station. Bus services even in the largest villages are almost non-existent – just one bus to and from Guildford each day in the Horsleys and none at weekends. Other areas have lost their bus service or it has been cut and many villages have a service which is infrequent. Since bus services depend on profitability, they cannot be expanded and the Council are not proposing to subsidise new ones. Rural buses are slow and lack predictability due to the congested roads. Most rural roads in the borough are narrow, winding, hilly, potholed, muddy and unlit. Many flood badly and have no footpaths. The desired modal shift would require a comprehensive co-ordination of bus and train timetables with services every few minutes, seven days a week, to stops within walking distance of every home in the borough. This kind of integrated public transport system has been achieved in Switzerland, for instance, but only at huge public cost and thanks to a political consensus supporting state ownership of trains, buses and the post office, which delivers rural passengers as well as mail. There is absolutely no chance of this in the UK. The vast majority of the borough’s residents are not, in practice, able to cycle. This includes children, the elderly, commuters who have to look smart, the infirm, the unfit and people carrying goods or shopping of any kind. Dependence on walking and cycling discriminates against these groups, which include some of the most vulnerable members of the community. It is socially unjust. One in two working people in Guildford commute for up to 3 hours a day. They will not leave their cars for even part of their journey if it means longer travel times. Park-and-rides are a welcome part of the transport mix but are too slow for commuters and others on a tight schedule. For an adult couple going shopping it is still cheaper to park in town. We like the idea of water buses but have concerns over the reality. The Wey is narrow and, with a river speed limit of 4mph, boats are too slow for anything but recreation. Except on the tideway, not even the Thames has such services. The addition of two new stations appears attractive but will slow down train journeys, which are already slower than at any time since the 1930s. Knock-on effects on localities where the new stations are built have not been worked out or presented. Ie.
The vast majority of the borough’s residents are not, in practice, able to cycle. This includes children, the elderly, commuters who have to look smart, the infirm, the unfit and people carrying goods or shopping of any kind. Dependence on walking and cycling discriminates against these groups, which include some of the most vulnerable members of the community. It is socially unjust. One in two working people in Guildford commute for up to 3 hours a day. They will not leave their cars for even part of their journey if it means longer travel times. Park-and-rides are a welcome part of the transport mix but are too slow for commuters and others on a tight schedule. For an adult couple going shopping it is still cheaper to park in town. We like the idea of water buses but have concerns over the reality. The Wey is narrow and, with a river speed limit of 4mph, boats are too slow for anything but recreation. Except on the tideway, not even the Thames has such services. The addition of two new stations appears attractive but will slow down train journeys, which are already slower than at any time since the 1930s. Knock-on effects on localities where the new stations are built have not been worked out or presented. Ie. Cost of housing will increase.

Who is the ‘sustainable corridor’ for if the vast majority of people are to live outside the town and are unable to walk or cycle to Guildford because of all the factors already mentioned, including lack of pavements and safe cycle routes? If more people lived in the town then this might be justifiable but as it is, it is unclear who will really benefit from it?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to policy P1 Surrey Hills Area of Outstanding National Beauty. This policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. The latter welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated. Many of our concerns stem from the loose wording of the Policy, which in some places renders the policy ineffective, for example: “All proposals will be considered against whether they...” “All development proposals within and adjacent to the AONB will be expected to conserve or enhance its special qualities.” Terms such as “considered” and “expected” are not strong enough in prohibiting development proposals that do not conserve and enhance the AONB, and it is likely that developers will be able to use this loose wording to their advantage. Of particular concern is the paragraph 3, which begins: “Whilst the AONB designation does not preclude specific types of development in the Surrey Hills and proposals will be assessed on their individual merits...” This whole opening clause is unnecessary and almost invites development proposals. We believe that it should be deleted, and the sentence should begin: “There is a presumption against major development in the AONB in accordance with NPPF."

We are also concerned that the AONB criteria listed in the policy are not the most important ones in determining whether a planning application should be approved. Aside from the one outlined in the first bullet point (which relates to the AONB setting) none of these criteria is concerned with the key characteristics of AONB, ie landscape character, scenic beauty, important views, tranquility etc. Whether or not a development supports the rural economy or provides public access are of far less national importance than preserving the quality of the landscape itself. We believe that the AONB Policy in the Draft Plan 2014 provided greater protection to the AONB, and would like to see the following sentences reinserted: “The national significance the AONB will be afforded the highest level of protection and only proposals which can be sensitively amalgamated into the area and which complement and enhance the character of the AONB will be considered” “Proposals within the AGLV which would have a negative impact upon views into and out of the AONB and which do not respect the setting, will not be acceptable.” In accordance with the most up to date Minerals and Waste Plan, safeguarding of applicable land within the AONB and/or AGLV may be necessary and deemed appropriate. Finally, we would like to see a clause which gives protection to the candidate areas for AONB status in the forthcoming Surrey Hills AONB Boundary Review.

This should include Blackwell Farm which was recently reviewed by an Independent consultant (annex 1) and deemed worthy of inclusion as a candidate. I consider that all land that has been assessed as meeting the latest Natural England criteria for AONBs should be subject to the same level of protection as an AONB, not just land that has been designated AGLV.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [Annex 1 - Hogs Back Natural Beauty Evaluation V2 24.05.16.pdf](5.9 MB)
the cornerstone of all local planning policy. It is precious beyond the short-term demands of the present Government’s policy or a 15-year local plan. As noted under Policy S1 above, it is a solemn legacy to future generations – an asset and amenity that belongs as much to Londoners and the whole nation as to the people who live in it. Once gone it is gone forever.

Policy P2 completely fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it serves a valuable purpose and it needs to be permanently protected. It was established in a local act of parliament in Guildford under the London Home Counties (Green Belt) Act 1938 and subsequently in the 1944 Greater London Plan to contain the outward sprawl of London. The boundaries of the Green Belt through Guildford Borough were later defined in the 1987 Local Plan, forming part of a 19-24km concentric belt around London. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and urban land. The principles of the Green Belt designation were outlined within Planning Policy Guidance 2: Green Belts (PPG2) and are found within the National Planning Policy Framework (NPPF). The Metropolitan Green Belt is an example of good planning and the envy of planners throughout the world. Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. Building on it involves high opportunity costs, including an irreversible loss of:

1. Agricultural production. 2. Rural leisure and tourism amenities. 3. Water catchment. 4. Flood control. 5. Biodiversity. 6. Natural heritage. 7. A carbon sink for air pollution. 8. Room for public facilities such as parks and burial grounds. 9. Profitable film locations (e.g. Shere). 10. Future economic potential such as mineral extraction (even fracking). 11. Natural beauty, landmarks, open space, rural views and sight lines. 12. Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF). As a matter of law and national and local policy, these assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultations. It is quite incorrect to argue, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold. We believe this policy is based on a flawed Green Belt and Countryside Study that, according to one Conservative Councillor, was irregularly commissioned by Council officers without the authority of Councillors.

We object to the removal of over 400 hectares of Green Belt land in and around Blackwell Farm to facilitate further development of Surrey Research Park and for 1800 homes. Over 60 hectares were removed from Green Belt 12 years ago for the same developer (Surrey University) who has yet to fulfill their planning obligations. This valuable land has been squandered with over 17 acres of surface car parking and as one of the key features of Green Belt is its ‘permanence’ this second request for yet more Green Belt land to be released in such a short space of time, with all the outstanding issues that remain makes this all the more objectionable.

Furthermore we object on grounds of the impact this development will have in terms of congestion on our highways, these issues have been highlighted under 'infrastructure'.

We object to the subjectivity of the Green Belt assessment and the inclusion of highly valued areas for development.

We object to the addition of Green Belt to prevent coalescence when areas such as Normandy and Flexford are being merged by development and so are the Horsleys. An area that has a higher landscape value (Blackwell Farm) on the same stretch of land (Hog's Buck) is proposed for removal and so the criteria and decision made over Green Belt removal and addition make no sense. We would otherwise support the additional Green Belt but only if there is parity between the various areas of Guildford.

Exceptional circumstances must be outlined and none have. We are also aware of planning permission that has been given locally within Green Belt where the developer or agent states 'there are exceptional circumstances' yet these are not outlined and approval is given? Policies must be in line with the NPPF and exceptional circumstances but be 'exceptional' which means by definition, 5 strategic sites with the vast majority on Green Belt cannot be 'exceptional'?
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2502  Respondent: 15275009 / Compton Parish Council (Fiona Curtis)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to the inclusion of Greenbelt sites where exceptional circumstances have not been given. Housing need alone has in case law, been overturned and the housing need is highly questionable. We question the soundness of 66% of almost 14,000 homes being proposed on Greenbelt land and whether any circumstances could warrant this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2273  Respondent: 15275009 / Compton Parish Council (Fiona Curtis)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to policy P4. Flood risk and water source protection zones. Urban development on existing hardstanding would not create additional flood risk, especially where there is scope for improved flood resistance measures to be included in the design. Sites such as Woodbridge Meadows Industrial Estate and the Arriva bus depot, on the River Wey bank, are potential high-value brownfield sites that would not be available for housing if this policy is implemented. It is not the footprint of existing buildings that should limit future development, but the extent of existing hardstanding. Tarmac and concrete do not act as functional floodplain, and some land with hard standing close to the river, within the town centre and within easy walking distance of the railway station, provides an excellent opportunity for real urban regeneration that could protect the surrounding countryside.

We strongly believe that this policy should not be used as a convenient excuse not to build on the extensive area of brownfield sites between the station and Ladymead. Any new development in this area could easily be built above flood resistant ground floor parking in areas that are identified as high flood risk. This area has been built over successfully over the last 50 years.

We do not support building directly on flood plain as the land is effectively a soak away, but intelligent architecture has been dealing with this problem for many decades in other parts of the UK and the globe.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Page 876 of 2804
We object to policy S2 the Borough Wide Strategy and the commitment to build 13,860 homes based on the Strategic Housing Market Assessment (SHMA) 2015 prepared by GL Hearn. The OAN “objectively assessed need” figure in the SHMA of 693 homes a year is far too high. We are surprised and concerned that GBC has adopted the OAN of 13,860 homes as the housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance. The scale of the housing number proposed inevitably increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

Other local planning authorities appear to take a more balanced view in their approach to planning. The Woking Core Strategy 2012 applies a constraint of 50% from the 594 new homes identified in their own SHMA. “It should be noted that local evidence (Strategic Housing Market Assessment - SHMA) highlights a need for an additional 499 new affordable homes every year in the Borough and a total of 594 new homes every year when taking into account demand. Given the level of environmental constraints present in the Borough, it is considered that the provision of an average of 292 dwellings per annum represents a reasonable level of housing growth for Woking and is deliverable.” Historically GBC has correctly applied constraints on housing numbers to protect the Green Belt. The Surrey Structure Plan 1994 advocated a general slowing down in the rates of development “because of the environmental constraints which exist in the County, including Green Belt”. This slowing down was reflected in the requirement that Guildford Borough should accommodate a net increase of 3,800 dwellings between 1991 and 2006. This was a lower rate of development than in previous years. It is interesting to note that the Structure Plan at that time expected sufficient land to arise within the urban areas to accommodate this requirement. However it would appear that today GBC has effectively ignored the real potential of the urban area to provide for housing. At the same time GBC has adopted a radically different approach to the policy of the Council over the last 20/30 years and are now ignoring government policy in relation to the Green Belt.

A detailed and comprehensive professional review of the SHMA dated June 2016 by NMSS an independent expert firm dealing with housing and demographics procured by Guildford Residents Association (GRA) has concluded that the OAN figure should be revised down from 693 homes per annum to 510 homes per annum. The 41 page report by NMSS (annex 5) which can be found on the GRA website entitled “A Review of the West Surrey SHMA as it relates to the Objectively Assessed Housing Needs of Guildford”. It was a real community effort. It was paid for by over separate 20 Guildford Residents Associations and Local Parish Councils none of whom were convinced that the SHMA report procured and presented by GBC was accurate or transparent or accessible in a meaningful way. So they clubbed together and collected contributions from many hundreds of Guildford residents to try to find out the truth of the housing need figure presented in the Local Plan. The NMSS report includes detailed analysis and financial modelling and was prepared by Neil McDonald. He is an independent adviser and commentator on housing demographics. He works with local authorities and others on the estimation of housing need and related issues. He was a civil servant and policy adviser to Ministers for over 30 years, the last 10 advising on housing and planning issues within the Department of Communities and Local Government. His 7 years as a Director at DCLG included a posting as Director, Planning Policy and a period as Chief Executive of the National Housing and Planning Advice Unit. NMSS found that the SHMA used in the Local Plan incorrectly adds extra homes to its basic demographic projection to allow for improving affordability of housing, increased student numbers and economic growth. The report found that none of these additions were justified based on the evidence presented within the SHMA. The report concluded amongst other matters that: The affordability of housing in Guildford is no worse than in other Surrey districts and boosting supply beyond the demographic OAN would not result in a noticeable improvement in affordability but simply in more people moving to the area. There are reasons for believing that the SHMA’s estimate of the number of homes needed for students may be too high and that an adequate provision for students is already included in the demographic OAN. The report advises that the Council should commission a separate student housing need figure for Guildford given the disturbing effect of students on our overall OAN. It envisages that, once this exercise is undertaken, improved accuracy means the overall OAN would be likely to reduce still further. The SHMA seeks to estimate the number of homes needed to support employment growth using employment rate assumptions that are inconsistent with the employment forecasts. This produces misleading results. An analysis of the Cambridge Econometrics and Oxford Economics forecasts using employment or economic activity rate assumptions consistent with the forecasts suggests that in neither case is there a need to provide more housing than suggested by the demographic analysis. Indeed, in both cases a smaller population growth (and hence fewer homes) could support the jobs growth that is forecast. A further independent report was procured in 2016 by the Campaign for the Protection of Rural England CPRE from Richard Bate of Green Balance, an independent consultancy with expertise in demographic and housing matters to carry out a review of the GL
The report by Green Balance runs to 37 pages (annex 6) and its findings are that the OAN for homes in Guildford should be reduced from 693 per annum to 481 because:

1. the vacancy rate figures should be taken from local government annual records rather than from the 2011 Census. This would reduce vacancy rates to 2.9% in Guildford.

2. there should be no increase for affordability above basic demographic change.

3. there should be no increase for Student housing and it was considered unrealistic that the University should be allowed to exert such substantial pressure on the domestic housing market.

4. the use of employment-led forecasts should be abandoned using purely household projections instead which are more reliable as a form of prediction. Two completely independent expert reports are surprisingly consistent in their findings. In broad terms a figure of approximately 500 homes per annum would appear to be a correct estimate of OAN for Guildford. However, this is before constraints are applied to arrive at an acceptable housing target. The SHMA is based on pre-Brexit projections for economic and population growth, including migration. These now need to be revised downwards. It is unacceptable that demographic and economic model assumptions have been withheld by GBC and cannot be checked making the process unaccountable. The figure of 13,860 new homes is unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by commercial sub-contractor used in preparing the SHMA. Both the National Planning Policy Framework and National Planning Policy Guidance provide a clear policy direction that the overall housing target should be reduced by a variety of constraints to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors. I have corrected this omission below. Infrastructure policies should be planned at the same time as Local Plans but in this case they have effectively been left out and are not sufficiently developed. The Framework also makes clear that, once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
- Guildford OAN Review D Reeve.pdf (172 KB)
- NMSS SHMA review annex 5.pdf (1.3 MB)
- Green Balance SHMA review annex 6.pdf (469 KB)

Comment ID: PSLPP16/2264  Respondent: 15275009 / Compton Parish Council (Fiona Curtis)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Ministerial guidance in relation to building on the Green Belt is clear: 1. “the single issue of unmet need - is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development in the Green Belt” - Nick Boles to Sir Paul Beresford MP 7th February 2014. 2. “we were always very clear that we would maintain key protections for the countryside, and, in particular, for the Green Belt. The Framework makes it clear that a Green Belt boundary may be altered only in exceptional circumstances and reiterates the importance and permanence of the Green Belt” – Nick Boles to Sir Michael Pitt, Planning Inspectorate 3rd March 2014. 3. “Planning Guidance, updated in March 2014, also states that unmet housing need is unlikely to outweigh the harm to the Green Belt.
to constitute the very special circumstances justifying inappropriate development within the Green Belt” – Nick Boles to Sir Paul Beresford MP 18th June 2014
70% of the sites put forward in the Local Plan are in the Green Belt which flies in the face of current government planning policy. The National Planning Policy Framework (NPPF), National Planning Policy Guidance and case law make it clear that Green Belt is an absolute constraint on housing supply. Exceptional circumstances need to be shown to adjust boundaries. Other constraints under the NPPF include assessments of sustainability, strategic flood risk assessment, physical constraints on land use and infrastructure constraints (this can include road congestion, schools, drains, power supply and medical requirements). Constraints should be applied to the Objectively Assessed Housing Need (OAN). However, this itself is overstated and should be reduced from 693 per annum to 500.

In view of the comments above it would appear logical to apply constraints in line with government policy to a corrected OAN, of approximately 50% to account for the fact that 89% of the borough is in the permanent Green Belt and development is not supported by adequate major infrastructure. This reduction is in line with the constraints percentage of 50% applied by Woking Borough Council. This would result in a more acceptable and practically achievable HOUSING TARGET of 250 homes per annum which over a 20-year period would be 5,000 homes. All of these homes could be built in the existing urban brownfield areas of the borough and would in part satisfy the 20,000 objections made by residents to the 2014 draft plan and also relieve the additional problems of inadequate infrastructure. It would also mean that there is currently 8.5 years supply of housing (2131/250) which is made up of existing permissions granted (1,518) and completions made (613) during 2013/2015. (Monitoring Report by GBC 2015) The Brexit vote may have strengthened government policy further. Theresa May, the new prime minister, announced on 11 July that she is personally committed to protecting the Green Belt once she takes office. Whilst I have many significant objections to the GBC Local Plan I applaud the policy statement by GBC in their Monitoring Report, “We will continue to monitor the use of previously developed land, and continue to identify as many opportunities as possible for redevelopment of previously developed land.” We believe it will be to the benefit of all residents if GBC can apply themselves vigorously to this endeavour in order to protect the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  SQLP16/495  Respondent: 15275009 / Compton Parish Council (Fiona Curtis)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

Key parts of the evidence are still missing, flawed or based on withheld assumptions. The Strategic Housing Market Assessment overstates need, the Green Belt and Countryside Study uses a flawed approach, and the Transport Assessment is too late and incomplete to be relied upon to inform the Plan.

The Plan excludes the Town Centre Master Plan, which plays a pivotal role and fails to address the results of infrastructure difficulties, or use these and Greenbelt to constrain the level of development.

The Employment Land Needs Assessment

We object
This document omits many important points that are to be addressed at a future stage. The information is, however, very relevant and necessary and without it the document is weak on evidence. The overview given does not assess the capacity of existing supply to accommodate future growth. The paper acknowledges that almost 9% of commercial premises are empty and this somewhat flies in the face of arguments to vastly increase the volume until the reasons are understood. Around 30% of businesses are considering leaving Guildford (congestion being cited as a reason). There are also issues with planning permissions being granted to convert office space to residential, whilst at the same time it is argued that more offices are needed? The contradictions appear to indicate that policies related to this need firming up and that the evidence is incomplete.

We disagree with 40% of land in the town centre being given over to retail as there is no evidence that Guildford will 'buck the national trend' in terms of declining high-street sales, as has been suggested by Cllr Furniss. Guildford urban area ranks no 1 in terms of being the most sustainable location in the borough and, as housing is a priority, there should be more than 1,172 residences in the town centre.

We object to Policy E4 (expansion of the Surrey Research Park into the Blackwell Farm) The existing Research Park has been built at a very low density (25% plot ratio), which is very low for an urban extension. The majority of existing buildings are 2 storeys giving a developed floor space plot ratio of only 12.5%.

The existing Research Park has acres of surface car parking, which provides it with the opportunity to markedly increase its density without infringing any Green Belt land nearby. Any density increase would be cost effective for the use of all existing infrastructure and would also have the potential to match the existing density of the neighbouring academic buildings on the university campus at Manor Park, which is five times higher.

Together with the existing expansion of 14% through existing consents and the opportunity to increase its density, the Research Park has ample capacity to expand to embrace new demand for B1b uses linked to the university, without utilising additional land.

**Infrastructure**

We object

The infrastructure schedule makes reference to 'improvements' without saying what they are. It includes a junction at the Guildford end of the A31, and another junction at Tongham. No evidence or traffic modelling data is available to demonstrate whether these 'improvements' will indeed improve anything at all given the additional traffic that will be generated by the new developments included in the plan. The Highways Assessment indicates that, even with these 'improvements', the level of congestion on the A3, A31, the B3000 and A25 will leave these roads over capacity and congested.

Constraints should be applied to the housing need/number as a full application of the overinflated number will have a severe detrimental impact on our road network. Smaller housing estates may be more difficult financially, but they would have less impact on infrastructure and could be considered where infrastructure already exists. The borough has many acres of surface car parking which, if replaced by multi-storey versions, and combined with current Brownfield sites, would free up enough land to build housing where it is wanted and needed and not on valuable Green Belt. There would be no need to build high-rise style development in Guildford town, which we don't support, but we do believe that buildings of 6-10 storeys (with underground parking) would be in keeping in some urban areas (where they don’t impinge on important vistas). [Some existing buildings already reach 5-7 levels in height].

The traffic maps omit the area south of Guildford borough completely and the lack of detail about impact on the B3000, a strategic route, is highly questionable, particularly as there are no solutions in place to deal with the impact. We are particularly concerned that, after the main highways routes of M25, A25, and the A320, the B3000 will incur the greatest increase in flow as this road is already close to capacity, with tailbacks at peak times. The road is no longer fit for purpose and modelling shows that developments planned, and the introduction of a new westerly route through Blackwell Farm, will severely worsen the situation, whether major work takes place on the A3, or not.

**The Highway Assessment**
We OBJECT

The strategic highway assessment requires a great deal more work and hence we OBJECT to the inclusion of this as evidence.

The B3000 runs through Compton, a small village with many listed buildings, most of which are very close to the road. The road already carries in excess of 5 million vehicles a year with average flow rates exceeding most A roads. It is the only settlement area in the borough where pollution levels exceed EU regulations and it is close to capacity now, with tailbacks at peak times, which add to the pollution problem. [see legal section]

The study is highly misleading. It refers to a figure of zero additional traffic from scenario 3, which includes the traffic from the strategic sites, one of which is partly in Compton. The assessment does not make it clear that the modelling is extremely limited and only includes impact on developments within the immediate area. Blackwell Farm is excluded from Area 107 (part of Compton) as false boundaries have been set. We believe that the impact from the strategic sites will be far-reaching and will most certainly impact Compton and beyond. Each village needs to be able to see the impact that development will have.

The Highways Assessment concentrates on peak time traffic only and gives no indication of overall volume increases or traffic type using specific routes outside peak hours. Understanding of the overall increase is important, as there is a bridge on the B3000 between Artington and Compton, which has a width restriction and may also require a weight restriction as it needs replacing within the next 2 years and no funding has been set aside for this. Instead Network Rail, SCC, GBC and Waverley BC continue to battle over responsibility for, and scope of, the project.

It appears that traffic data has been collected at different times of the year and over varying time scales in order to provide averages. This method of data collection can underestimate measurements by at least 30%.

Furthermore, we have been told that the person responsible for ratifying traffic data at Surrey County Council (SCC) has been off sick for over a year and that, whilst the daily data boxes continue to collect data, that data has not been collected or analysed for 2015. The data put forward for Compton's B3000 was based on a 3-week period in January and, as this was not representative, we understand it was removed. That said, the year-on-year data is for different periods and different times, varying from a few weeks in winter to longer periods over many months. We would like a more robust approach to traffic data collation.

The cumulative effect of the additional traffic generated by the developments in the proposed submission Local Plan will be to increase congestion, even with the proposed highway improvement schemes in place. More detailed analysis of the junctions and queuing is required. We question the conclusion that the developments would have *An acceptable impact on the capacity of the highway networks in terms of the policy test set in paragraph 32 of NPPF*. We do not believe that the impact on the B3000 will be acceptable, as it is already operating beyond capacity, and this situation will be made much worse following the mitigation proposed for the A3.

The Highways Assessment is limited to 30 results. Roads have been omitted from the report and it is unclear whether findings for the B3000 (also referred to as The Street B3000) are in fact from the Street or the roundabout from which there is a feeder road to Godalming via Priorsfield Road.

The table comparing scenarios and the impact on traffic is difficult to decipher. Scenario 1 includes current planning permissions plus Waverley's strategic sites. This shows an increase of just 9 vehicles per hour at peak times on the B3000. The next scenario 2 is the same, but includes GBC's strategic sites. Given that there is a strategic site in Compton of 1,800 homes and another of 1,000 at Normandy, the expectation would be for the volume to be not only higher, but considerably higher. The result is however, ZERO. We understand that this is because the impact measured is only from the immediate area and, as Blackwell Farm has been removed from the village for modelling terms, this does not give a realistic result. The omission of the Town Centre Master Plan and its impact on the roads further diminishes the integrity of this Highways Assessment.

Even without the full impact being understood, it is clear from the scale of development on the west of Guildford (1,800 homes at Blackwell Farm, 1,000 homes at Normandy, 1,300 homes at Ash, 3,800 homes in the Aldershot urban area, 1,200 homes at Borden) that the increase in traffic on the B3000 and other main routes would be severe.
The Highways Assessment shows that as a result of the proposals put forward in this draft of the Local Plan the B3000 will suffer the highest increase in flow rates at peak times (after the M25, A320 and A25. It also reveals that traffic flows would increase if the A3 was widened, as the A3 would then attract more traffic via the B3000. Despite this, there are no solutions planned to mitigate the situation and we are therefore strongly objecting to the level of development and in particular strategic development at Blackwell Farm as outlined in the Local Plan.

The proposal to introduce a new route to Guildford town centre from the west via Blackwell Farm has been ill thought out. The volume of traffic that will use this new ‘rat run’ through the new development and the university campus/business park, has been underestimated. There will be problems for traffic wishing to exit the new development in both directions during peak hours - traffic is frequently queueing for miles along the A31, and the Tesco roundabout is one of the worst bottlenecks in Guildford. The knock-on effect on the Egerton Road/Gill Avenue junction would impede emergency vehicles getting to and from the hospital.

The 4-way junction on the A31 has no detail at all and the concern is that permission in principle will be given to the site in the hope that these problems are surmountable. If they are insurmountable, which we believe they are, then enormous amounts of Green Belt land within the setting of the Surrey Hills AONB will have been sacrificed for nothing. The 4-way junction, if it goes ahead, is likely to be huge and, due to its elevated position, will cause significant harm to the AONB in terms of landscape and light pollution.

The Highways Assessment has many limitations, not least being the absence of the Town Centre Master Plan, which includes potential road closure and re-routing. Compton is likely to be very much affected by any reduction in road capacity in the town centre and it is important that we are presented with the whole the picture.

The Assessment acknowledges that not all impacts of proposed Blackwell Farm development have been modelled and that, due to the emphasis on the A31 and the A3, not all roads were included.

The report concludes that the improvements to the A3 are necessary to maintain adequate flow rates on the strategic network. Further work is needed to determine what impact any widening or junction improvements will have on local roads, and what will be done to mitigate against the increased flows through Compton, particularly given that a section of the B3000 though the Village is anticipated to become an Air Quality Management Area. GBC has resisted requests by members of the PC to have the northern end of The Street made an AQMA, but readings of nitrous oxide in this area are well above EU legal limits.

Note Annex 3 - Independent traffic report by RGP - attached.

There is little information about the tunnel but the map indicates that one access / egress point will be in Compton near the A3, although no land has been safeguarded for this purpose. This is likely to have the same impact as the improvements to the A3, i.e. increased traffic (and pollution) through Compton.

**The Spatial Hierarchy**

The spatial hierarchy, which outlines Guildford's preferred strategy, does not match up with the proposed plan. The hierarchy places Brownfield sites (including those on Green Belt) as a priority, but the Plan has 66% of development on Greenbelt and only 34% on Brownfield. The hierarchy lists Guildford town and urban areas as a priority followed by inset villages and identified Green Belt villages. A relatively small percentage of housing is allocated for Guildford town (the most sustainable location) and Green Belt areas, such as Blackwell Farm, with high sensitivity have been classified as within the 'Guildford urban area' when they are in fact in the open countryside. We are told that only 1.6% of the 89% Green Belt has been earmarked for removal and that the 6% removed via insetting doesn't count as these villages are already developed. If this is the case, why list them in 4.1.16 of policy s2 - Spatial Strategy?

4.18 The preferred options cannot accommodate all that Guildford 'needs'. This is untrue. Two specialist consultants have independently critiqued the OAN and both question the level of uplift and the use of ONS data without full correction for changes and anomalies. They refer to 'double accounting' as the uplift is introduced at several stages and the assumptions that result in the final OAN are not explained. See comments on Strategic Housing Market Assessment (SHMA).

**Strategic Housing Market Assessment (SHMA)**
We Object

The “objectively assessed need” figure of 693 homes a year is too high.

A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the SHMA method should be changed to consider student housing need separately due to the distorting effects of students on the figures.

The current SHMA inflates the proposed housing figure due to:

- failure to correct for errors in the historical data for international migration flows,
- issues with the way it considers students and affordability, and
- flaws in the method for estimating the number of homes needed to support job growth.

It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

Two additional reviews of the SHMA reach similar conclusions, one having been produced by CPRE and the other by Cllr. David Reeve.

The Land Assessment

We object

The exclusion of sites of 5 dwellings or fewer from the list might make administration easier, but the addition of these sites plus windfalls and outstanding (but current) permissions gives rise to a higher number of dwellings than is actually needed. There is therefore no justification for release of all the Green Belt put forward.

The criteria used to include or exclude sites because of this study lack consistency, with many sites excluded as 'unsuitable' with no further explanation offered (many of which were in the urban area of Ash). The assessment lacks objectivity and detail.

Green Belt & Countryside Study

We object

GBC’s Green Belt & Countryside Study does not value appropriately the “fundamental aim” of Metropolitan Green Belt or look strategically at options for developing in major settlement areas beyond the Green Belt. It is pointless for London to apply constraints to protect its Green Belt if areas within it, such as Guildford, choose to ignore this option. It is the same Green Belt and serves the same purposes, all of which are acutely valuable.

The way Green Belt is parcelled up and scored is invalid: serving 2 Green Belt functions well is as legitimate as serving 3 to 5 functions less effectively. The Green Belt sensitivity analysis is not a valid basis for informing decisions. This method also omits purpose one, on the basis that all Green Belt sites encourage regeneration of urban sites. This should not be excluded for it is valid and could even be argued to be particularly valid in areas close to the town. Boundaries used for Blackwell Farm were neither permanent nor defensible.

Proposed removal from the Green Belt of a number of relatively small sites where development of an exceptional nature has taken place, plus adjoining land, has lost sight of the scale at which Green Belt is effective.

Assessment of which villages to take out of the Green Belt does not adequately consider that villages contribute to the openness of the Green Belt, as seen from surrounding AONB.

A key principle of Green Belt is its permanence. The University Consultants stated this 13 years ago when seeking permission to take Manor Farm out of the Green Belt to create Manor Park. They reassured residents that the boundary
would not be frequently moved and that Blackwell Farm would be opened up to the public for “informal recreation”. The
same Consultant has now repeated this promise in putting forward the University plans to develop on Blackwell Farm,
saying that the new boundary would be permanent for at least 25 years!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Guildford OAN Review D Reeve.pdf (172 KB)
NMSS SHMA review annex 5.pdf (1.3 MB)
Green Balance SHMA review annex 6.pdf (469 KB)
Hogs Back Natural Beauty Evaluation V2 24.05.16.pdf (5.9 MB)

Comment ID: SQLP16/496  Respondent: 15275009 / Compton Parish Council (Fiona Curtis)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

The Plan preparation process has had inadequate regard for national policy, which attaches “great importance” to
the “openness” and “permanence” of Green Belt. The test of “exceptional circumstances” that might justify
allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a
strategic level.

The Sustainability Appraisal seems to have lost sight of the concept of Sustainable Development as described in the
National Planning Policy Framework to the extent that we question whether it complies with the requirement.

The report states that there are no pollution issues in Guildford. This is not true. The A3 end of the B3000 exceeds
Eu regulations and this should be flagged in the 2015/16 air quality report which the Council has yet to publish.

We object

The 2015/2016 air quality management report has not yet been published and this will/should include an area at the A3 end
of Compton, which exceeds the recommended max NO2 reading. One year results for NOx are 48.728 with high's of 68
using National bias adjustment.

Cllr Furniss indicated that the location of the test tubes may have made them invalid, but measurements show that they
were positioned correctly and monitored for over a year by GBC environment officers, who have now added additional
monitoring devices (See Annex 1 – Correspondence between Cllr Curtis and Cllr Furniss). This area qualifies as an air
quality management area (AQMA) and it is disingenuous to omit this from the report or to use an old report on the basis
that the 2015 report is not yet published, as the problem is known and recognised by the environment department within
GBC.

The traffic survey shows increases in overall flow at the B3000 monitoring point, of values between 5.6% and 16.5%. This
would severely impact flow, which is not in line with National Policy as further congestion would exacerbate the current air
quality issues as the A3 end of the Street.

We do not believe that a regulation 19 consultation is appropriate. Whilst few changes have been made, additional sites
have been included without opportunity for regulation 18-consultation input.
The video used and paid for by GBC and taxpayers is biased towards development, and hence raises questions over the validity and legality of such marketing campaigns. All the individuals featured in the video, with the exception of one nurse have previously spoken in the Council Chamber in favour of house building/building on Blackwell Farm; and there is not a single voice representing protection of the Countryside or outstanding landscapes.

Site A26 - Blackwell Farm - See Annex 4 attached.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  
- Air Quality correspondence.pdf (408 KB)
- Independent Traffic report annex 3.pdf (2.5 MB)
- Site 26 BWF Annex 4.pdf (456 KB)

Comment ID:  SQLP16/498  
Respondent:  15275009 / Compton Parish Council (Fiona Curtis)  
Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire):  (No)

We object

The plan is not so much positively prepared as avariciously prepared. We do not consider that it is reasonable to take on unmet need from neighbouring authorities, which have given greater protection to their Green Belt if it means our own is compromised on the scale being put forward.

We believe that constraints should be applied to the housing target, which we understand equates to the objectively assessed need (OAN) as no reasonable constraints have been applied. The constraints that could and should be applied are Greenbelt and considerable infrastructure issues. The solutions suggested to accommodate the inordinate levels of growth are both inadequate and costly and the net result will be serious debt for many years if not generations.

It was recommended by landscape consultant Alison Farmer Associates that the area known, as Blackwell Farm should be considered in the AONB boundary review, yet it was omitted in Surrey CC’s landscape evaluation. This meant the Parish Councils of Worplesdon, Compton and Wanborough had to fund an independent review to ascertain whether the area was a contender for AONB classification. The survey was carried out by in May 2016 by Land Management Services Ltd, which concluded that most of the 265 hectare farm was of a landscape and scenic quality that merited inclusion within Natural England’s revised Surrey Hills AONB boundary.

It raises serious question about the soundness of the evidence base when Surrey CC says that it only has to account for evidence submitted and not for that omitted? The area within the proposed development site at Blackwell Farm should now be considered by Surrey Hills as part of the AONB boundary review and land to the west should remain undeveloped, as it is important to the setting of the AONB.

The plan is not justified. Residents groups have suggested other strategies but these have not been tested or considered against the current trajectory, which has remained largely unchanged since day one.

Many aspects of the Plan were strongly objected to in 2014 and not only have these points been ignored, they have in fact been embellished or made worse. I refer to the points that GBC referred to in their own summary, which stated that most
people objected to the scale of development and the harm to the Green Belt. At that time there were 4 strategic sites and now there are 5. At that time approx 50% of development was in Green Belt and now it is 66% with only 34% on previously developed sites. 58% of development is on just 5 sites.

A more realistic appraisal of the town centre with more multi-storey car park development and less retail would make way for a greater percentage of housing in the town centre, which is after all the most sustainable and sought after area. Additionally, greater pressure must be placed on the University to house more students at Manor Park in order to free up affordable rented accommodation in the town for key workers.

There is a conflict of interest when the developer (University) drags its feet over the provision of promised student accommodation (thereby putting pressure on the housing market) whilst at the same time seeking permission to build 1,800 new homes to help Guildford's need? The University is at least five years behind with programme of building student residences and staff housing. It is widely agreed among residents groups that the University must fulfil all of its current building plans and substantially increase the proportion of students on campus. If the University built the outstanding units, the housing need would reduce substantially yet much of this is omitted from the outstanding permissions list?

GBC has approached development without applying constraints that are applicable such as Green Belt and infrastructure. It is wholly inappropriate to build a Plan without constraints when there is widespread opposition to this approach. Furthermore, there are serious doubts over the validity of the objectively assessed housing need. Housing need underpins the entire plan, and we are being asked to accept the figure of 693 on trust. Without an understanding of the methodology behind the OAN, the public cannot 'buy into' this figure, especially as it has been illustrated by two reputable professionals that there have been errors such as 'double accounting', which has resulted in uplift. Both consultants have concluded that a more accurate figure would be around 500 new homes pa and the most recent one, which was done in pre Brexit-June 2016 acknowledges that due to the high number of International students here in Guildford a student SHMA would better inform this plan. Both consultants feel that the current SHMA is flawed and that the OAN of 693 is too high. These reviews will be submitted by CPRE and the GRA and we support the findings of both.

Putting 58% of development on 5 sites, which are within the Green Belt, or largely within the Green Belt, is not consistent with national policy. The definition of 'exceptional' is forming an exception or rare instance; unusual; extraordinary. What possible exceptional circumstances can justify 3 sites of approx 2,000 each and two of 1000 each, on Greenbelt. This makes a mockery of the term ‘exceptional’?

The plan has a maximum number and a hefty buffer. It has underestimated windfalls and overestimated need. It is likely therefore that if one of the major sites fails to come through, the Plan could still succeed in terms of numbers, but would fail in terms of impact on infrastructure and reliance on aspirational, but distant 'yet to be discussed' schemes such as railway stations, making the plan undeliverable. If more people are not given the opportunity to live in Guildford town, the night time economy cannot grow and if the gamble to use 40% of the land for retail fails, shops will close and we will have created a leafy green ghost town, whilst the villages outside the town will have changed beyond all recognition as the impact of urban sprawl takes its toll.

The plan puts many eggs into 5 baskets with 58% of all development on just 5 sites. If these are not deliverable, the plan will fail. This strategy has been roundly criticised by Inspectors in other parts of the country.

Taking on such a high OAN without scrutinising it and then taking land out of Green Belt to fulfil it, and using developer funding to secure infrastructure (which reduces significantly the proportion of affordable housing delivered) is destructive and risky.

It is inconceivable that 5 sites between 1,100 and 2,000+ each can be built on Green Belt land without affecting the purposes of the Green Belt.

AONB should be given the highest protection. Despite being put forward for AONB review Blackwell Farm was omitted and an independent consultant had to be commissioned by local parish councils. The findings showed that the area met Natural England’s latest criteria for AONB and should not therefore be developed but should instead be properly recognised.
The proposal at Blackwell Farm has been reduced from 2100 to 1800 to take account the impact on future AONB or for views in and out of the existing and future AONB from public areas as determined by planning policy. It is feared that if this site were approved and if access could be made possible without causing serious problems to the surrounding road network, that the AONB in this location would undoubtedly be destroyed.

GBC argues that it is necessary to remove more than 1.6% of its 89% Green Belt and to remove more than 6% of its Green Belt from villages (by way of insetting) in order to meet its need, yet at the same time the Council advocates making an additional area Green Belt? The area of land being put forward for inclusion within the Green belt is on the same ridge as two areas of Green Belt it wishes to remove (Normandy & Blackwell Farm). This approach lacks consistency.

Cllrs Paul Spooner and Matt Furniss have stated clearly that there will be no development without supporting infrastructure and that the infrastructure must come before, or alongside, development. It is difficult to see how this will materialise as developers’ CIL contributions (which will fund infrastructure) are paid from profits made from the development. This statement appears to be unenforceable and could offer false reassurance to residents who may support the Plan on this basis.

Developers are being asked to fund large amounts of infrastructure. They will offset this against any agreement for affordable housing and it is highly possible that affordable housing will not be built or that only a small proportion will be built. This was one of the key drivers and is factored into the housing need, yet may not be delivered. Where is the general analysis to see what level of affordable housing might actually be delivered given the level of infrastructure needed to implement this level of development on new sites?

The omission of the Town Centre Master Plan (on the basis that this has different timescales) invalidates two key components of the Plan - the Infrastructure and Highways assessments. The suggested road closures in the town centre and the resulting re-routing of traffic should be factored into the highways assessment, but they are currently omitted. The consequences of this could render the whole Plan undeliverable and I don’t believe the Plan can be approved without factoring in the Town Centre Master Plan.

GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA), which CPRE and GRA consider unsound. The methodology for the uplift and assumptions made have not been made available and thus the openness and transparency required for public understanding as outlined in the NPPF has not been adhered to.

We understand that Highways England will not start to consider its intentions as regards the A3 in the vicinity of Guildford until 2018. It is difficult to see how plans can be approved without the inclusion of this information.

Network Rail has not made available for the public consultation any plans for a new railway station at Merrow, nor have we been told where the station car park would be situated nor how the railway bridge between Merrow and Burpham would be re-constructed to take the additional traffic. Likewise, there are no detailed plans for the railway station at Park Barn and Network Rail has not confirmed the status of either. These schemes must have a sounder footing to be included in the Plan if they are to be used to justify large developments nearby.

The access to, and from, Blackwell Farm (via the A31) has not been thought through. There proposed new route will likely be used as a rat run to the A3/Guildford, but this will put pressure on a congestion hot spot, and result in increased traffic at the Compton turn-off and Down Lane (home to Watts Gallery). It is also recognised that congestion at the Tesco roundabout will be made worse and this area is already subject to considerable problems. Additional traffic via the business park from Blackwell Farm will add to congestion at the Egerton roundabout and impede access for emergency services to the hospital.

The proposal at Blackwell Farm has been reduced from 2100 to 1800 to take account of the AONB, but this does not account for views in and out of the AONB from public areas.

The greenbelt sensitivity study is not objective. The reference to Blackwell Farm as 'South West Guildford Urban' is totally misleading as it is unadulterated countryside that fulfills all the purposes of Green Belt. We consider this Study, which was the subject of much criticism in the last plan, to be flawed, yet it remains in this Plan. We ask why?
The damage caused to the Green Belt by the addition of Blackwell Farm would outweigh benefits gained from development, as there is ample space and lapsed planning permission on the existing Manor Park land for development for student accommodation, which would free up affordable rented accommodation in the town.

The proposal for Garlic Arch was added to the draft Local Plan without any consultation under Regulation 18.

No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Guildford citizens.

No land has been safeguarded for a tunnel, which would show a real intent.

This consultation included 'significant changes' according to GBC, although most residents would strongly dispute this. Some key reports were added and 6 weeks was not long enough to properly digest the information and impart this to residents. Many additional questions had to be asked and many points required clarification, which essentially meant adequate information, was not made available until two thirds of the way through the consultation.

The level of objection at the 2014 consultation was considerable - these objections have NOT been dealt with, but have been carried through to a regulation 19 consultation, undeterred. This is not in the spirit of Localism or the NPPF.

Please refer to files uploaded for question 2

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Site 26 BWF Annex 4.pdf (456 KB)

Cooperation is a two-way street. Guildford objected to Waverley's plans for Dunsfold on the grounds of increased traffic and in the same submission referred to positive consideration of unfulfilled OAN. Guildford also refers to its duty to consider Woking's unfulfilled housing. Guildford does not have land to spare to assist Waverley or Woking without taking vast amounts of land out of Green belt, which is protected by the NPPF. Greed is not 'an exceptional circumstance' and if both Woking and Waverley (and indeed London as it is the Metropolitan Green Belt) prefer to protect their Green Belt then the question must be asked as to why Guildford is happy to relinquish its Green Belt land, especially in the face of strong public opposition.

Many also question the choice of just Woking and Waverley as partners in the SHMA as there are considerable links with Aldershot and Farnborough in Rushmoor, which have very different needs and their inclusion could have provided a better balance.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** SQLP16/503  **Respondent:** 15275009 / Compton Parish Council (Fiona Curtis)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

Blackwell Farm strategic site is partly within the Parish of Compton and a representative from the Parish Council would wish to attend the examination.

The village of Compton will be severely affected by traffic and congestion if plans go ahead and hence we would also like to be present for discussions relating to infrastructure and highways.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  
- Independent Traffic report annex 3.pdf (2.5 MB)  
- Site 26 BWF Annex 4.pdf (456 KB)

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**Comment ID:** SQLP16/507  **Respondent:** 15275009 / Compton Parish Council (Fiona Curtis)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Comment - Localism**

The Plan is supposed to be informed by residents and by parish councils and residents' groups and their input used to formulate the Local Plan, not for it simply to be presented to them and objections and subsequent input ignored. Despite a great deal of effort from these groups and many like-minded responses, the Plan has not taken their concerns on board. The Plan has barely changed since day one and residents feel their views have been ignored and that the consultations have not been genuine. To add insult to injury, some of the key points raised have actually been exacerbated or made worse, such as the scale of development and harm to the Green Belt and issues over infrastructure.

The NPPF is open to interpretation, but it is our belief that GBC has chosen to interpret it in a way that lacks objectivity in an effort to appease developers in order to avoid costly court cases at a later stage. GBC has cited cases where development has been granted in an effort to justify this pro-development stance but has failed to balance this against the many sites where development has been refused.

To gain true public reaction, material presented has to be factual and unbiased and written without jargon and acronyms. This has not been the case. A degree of 'double speak' has led to absurdities such as 'affordable housing' which is over £300,000 i.e. ten times the average salary; 'safeguarding' which does not mean protection of land as most people would think, but rather potential future development and 'insetting' which means removal? It is recognised that these terms are not locally derived but all the same they are confusing for members of the public.

Some Councillors have shown a lack of knowledge about environmental matters. Cllr. Gunning - webcast 24th May section 7 - 3:39
'About ancient woodlands, of course they are very attractive things, but they are ancient and trees don't last forever, so can we be practical about ancient woodlands and consider their value or their life, I should say, their life'

May 11th - Cllr Ellwood announced that he couldn't understand what all the fuss was about pollution as his Mother had lived (presumably unaffected by it) under the flight path at Heathrow?

Whilst people have been encouraged to take part in consultation, objectors have been subjected to name calling and public humiliation. There are too many examples to list and so I am listing the most recent. http://www.guildford-dragon.com/2016/07/10/letter-not-surprised-mr-patons-comparison/#comment-157440

The Local Plan has divided communities and highlighted weaknesses and alliances, which have resulted in a breakdown of trust between residents and those whose job it is to implement the Plan.

The Plan has been roundly criticized and objected to and yet it is presented to us once again. Many feel the consultations to date have been worthless and feel they have already made their points, which were ignored and will not therefore be making them again as they fail to see the point?

It simply is not possible to address infrastructure shortfalls by building in the hope that developers contributions will cover the costs as the level of development needed negates any benefits gained and in many cases, the situation is made worse.

Central government funding is needed to address current problems so that funding from development can be used to implement additional infrastructure needed to make new sites viable without damaging their surroundings. It must be accepted that geography and lack of previous investment leave some areas with less opportunity to do this than others.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>SQLP16/511</th>
<th>Respondent:</th>
<th>15275009 / Compton Parish Council (Fiona Curtis)</th>
<th>Agent:</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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Brownfield

Yes, we need a new Local Plan for our borough in order to provide a development strategy within which we can accommodate our local housing, economic and environmental needs. But first we must make good use of our urban brownfield before we consider building in the Green Belt or countryside. Paragraph 80 of the NPPF clearly states that Green Belt serves a key purpose, “to assist in urban regeneration, by encouraging the recycling of derelict land and other urban land”. In order to comply with central planning policy we need a brownfield strategy that states clearly. “We are committed to a brownfield first initiative whereby all applications on previously developed land are given fast track priority and every facility to promote development for residential purposes and employment purposes in order to satisfy the needs of local people. In parallel a low CIL incentive should be given for all residential development on brownfield land. In response to the detailed objections received in the Regulation 18 process of the 2014 Local Plan and also in accordance with government policy a Guildford brownfield land register should be urgently compiled showing address, ownership, occupier, current use and detailed planning brief. Perhaps someone could be appointed at GBC with a clear briefing to deliver brownfield targets of housing and employment space. GBC needs to accelerate the residential redevelopment at Woodbridge Meadows, Walnut Tree Close and the Station within the next 5 years. GBC needs to examine the residential
development opportunity of the 25.7 acres of car parks in GBC ownership. We do not consider that the target of 1,172 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core by increased economic impact. The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015 which has recently been adopted by GBC. The reality is that the Town Centre has the capacity for significantly more homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp172/2598  **Respondent:** 15275009 / Compton Parish Council (Fiona Curtis)  **Agent:** Green Balance

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

**Policy A26: Blackwell Farm**

1. The Save Hogs Back response to the June 2016 Pre-Submission Consultation (Regulation 19) provided a comprehensive set of reasons why the Blackwell Farm strategic development allocation was so unacceptable that the Council should not proceed with it. Apart from the serious environmental damage it would do, we questioned whether it was practicable. The June 2017 Consultation indicates both the determination of the Council to press ahead with this extraordinarily inappropriate scheme and also that it is trying to deny the implausibility of the development proceeding, if at all, without appalling consequences. Modest amendments have been made to various policies in the Plan, but collectively they demonstrate that after another 12 months of searching the Council has still found no solutions to the problems we identified.

2. The unresolved problems centre on access and egress. Although pitched as an urban extension to Guildford (in the Spatial Vision, in Policy A26 and in paragraphs 4.1.8 and 4.6.24), Blackwell Farm has proved impractical to integrate into the town despite its physical proximity. There are many facets to this, the main ones being:
   - the Blackwell Farm development cannot proceed without the capacity of the A3 trunk road being increased to bolster the strategic route in and out of Guildford, and the possibility of this happening is unknown;
   - movement between the development area and Guildford, which is already extremely congested, would be substantially more impeded by the development;
   - alternative means of access to the development area would have both significant practical problems and significant adverse consequences for the highway network;
   - the ‘Sustainable Movement Corridor’ to tackle that congestion is most unlikely to be effective on the scale necessary to resolve access issues and will fail in its key role of reducing congestion;
   - the combined effect of the Blackwell Farm development and the A3 widening through Guildford (itself needed in part because of Blackwell Farm) would be to raise substantially the Nitrogen Dioxide levels in Compton on the B3000 still further above legal limits at the most polluted point in the Borough.

In each case the Proposed Submission Local Plan has wholly failed to show that the Blackwell Farm development is practicable. We examine these in more detail below, after showing that the pressure on the road network in the vicinity of Blackwell Farm will be discernibly greater than forecast only one year ago.

**Traffic generation in relation to road capacity**

3. Mouchel have pointed out, in advice submitted by Highways England in response to the Proposed Local Plan 2016, that
there are significant limitations in the evidence presented in the Strategic Highways Assessment Report (SHAR) accompanying the Proposed Submission Plan in June 2016 which affect Blackwell Farm:

- the traffic generation model used in the Local Plan allows no merge delay at junctions: this is clearly not the case at present and is not claimed by GBC to be the case even after new road infrastructure has been built. As Mouchel point out, the effect of the model is to make the A3 and A31 particularly attractive roads because they are assumed to be readily accessible and to draw traffic towards them, whereas in reality there will be less ready access and greater use of the local road network;
- the model uses average peak period traffic movement figures across the three hour period 07.00-10.00, which will tend to understate movements in the true peak hour (circa 08.00-09.00). That will have a significant impact on congestion during periods when the network is most heavily used and, in the vicinity of Blackwell Farm, overloaded.

4. The SHAR indicated that the total vehicle generation anticipated by the Blackwell Farm development would be 717 vehicles leaving in the weekday average morning peak hour (Table 3.3, zone 576). How these vehicles would get out of Blackwell Farm has not only made no progress but deteriorated. There are some indications of this in the County Council as Highways Authority and Highways England responsible for the A3), the prospect of adequate network

8. In the 12 months since the 2016 Proposed Submission Consultation by the Borough Council (working with Surrey County Council as Highways Authority and Highways England responsible for the A3), the prospect of adequate network road access to Blackwell Farm has not only made no progress but deteriorated. There are some indications of this in the alterations in the June 2017 Proposed Submission:
– the proposed link with the A31 has been downgraded from its ‘primary’ status and by default the link with Guildford is now presented as of equal significance (Policy A26 Infrastructure Requirements item 1); there are various reasons for this, explored below, but fundamentally the Council has been unable to find a way of making the link with the A31 work as it wanted;

– a major new secondary school with six form entry must now be provided on the Blackwell Farm site, which was previously sited elsewhere (Policy A26 Allocation item 9): a school of this size (circa 900 students comprising 180 students in each year group for five school years) would generate a very substantial amount of additional traffic, bringing in about 600 students daily from outside Blackwell Farm, much of it attracted from Guildford, but there have been no changes at all to the proposed capacity of the road network to accommodate this, which can only mean still worse congestion on Egerton Road and the surrounding network than inevitable anyway;

– proposals in principle are now included for limiting the road users on the new route linking to the A31 (Policy A26 Infrastructure Requirements item 3), but these are deliberately left vague as the Council has been unable to find a way of achieving this despite trying to do so for the last year;

– the developer of Blackwell Farm (ultimately University of Surrey) must contribute to funding improvements to the local road network necessitated by the scheme, but this must now have “regard to the Sustainable Movement Corridor Supplementary Planning Document”: as this SPD has not yet been published even in draft, the policy change demonstrates a remarkable lack of clarity about the role of the SMC in relation to Blackwell Farm (where it will go, how it will be built, who pays for it and how it links into the wider network) and creates an open-ended commitment which could affect the viability and deliverability of Blackwell Farm;

– the new Policy A59 has given a clearer specification of the need for a new railway station at Park Barn near the northern end of Blackwell Farm, with access from both the north and south sides: the access from the south will generate additional traffic affecting the roads to Blackwell Farm, especially in peak periods, which has been neglected in the calculation of traffic generation and the modelling of its distribution to the road network, again placing additional stress on already massively overloaded roads in peak periods.

These changes are additional to the increased traffic on Egerton Road and the surrounding network arising in any event from development planned or under construction at Manor Park and at the existing Research Park.

Traffic on the A3

9. Guildford Borough Council has adopted conflicting positions regarding its intentions for traffic on the A3 through Guildford.

10. The Council has endorsed a study commissioned in 2014 from Arup Guildford Town and Approaches Movement Study, a vision statement on transport in Guildford to 2050. This is the basis for the Sustainable Movement Corridor now promoted through the Local Plan by the Council (see paragraphs 51-53 below). However, the Arup study was clear that the purpose of the A3 should be to concentrate through-Guildford movements on this road, assisted by inhibiting its use for local movements. The study recommended: “Interventions in this strategy that reduce roadspace in the town centre should serve to deter through traffic in the town; they should also reduce short journeys on the A3 within the town (for example, trips from the Surrey Research Park to the town centre via the A3) that will free up capacity for longer distance trips on the A3 trunk road”.

11. The Arup study was clear that there should be no capacity increase on the A3 trunk road through the town: “In the appraisal of interventions undertaken for this study, all potential interventions that increased road capacity, including A3 interventions (widening, northern bypass, tunnel) and additional road links in the town centre, resulted in increased traffic levels in the long term over and above business-as-usual changes (i.e. in 2031 compared to the 2031 Business-As-Usual). Vehicle mileage increased by up to 2% across the borough and highway delay increased by up to 16%, with associated deterioration in air quality, noise impacts, land use impacts and Save Hogs Back & Compton PC 5 by Green Balance severance. These interventions are therefore not included in the strategy as they do not strongly support the multi-faceted headline vision for sustainable mobility in the town of Guildford identified to guide the development of the strategy.”

12. However, this study is increasingly being compromised. Arup’s limitation on using the A3 is wholly at odds with the approach which Guildford BC is taking in practice. The Council has decided that the Blackwell Farm development cannot proceed without substantially increased capacity on the A3. The last sentence of the 2017 Local Plan’s ‘Spatial Vision’ states: “The delivery of housing in the later stages of the plan period is dependent upon major improvement to the A3 through Guildford”. This is due to existing major peak hour congestion on the A3 (Local Plan paragraph 2.14a). The June
2016 Strategic Highway Assessment Report concluded that “the results of this assessment indicate that should the [DfT’s] Road Investment Strategy schemes [which include major A3 capacity increases through Guildford] not be forthcoming then the residual cumulative impact of the Proposed Submission Local Plan on the highway network could be considered severe…. To avoid this occurring in such circumstances of the RIS schemes not being forthcoming, then the quantum and location of development as proposed may have to be amended” (page 63, emphasis added). This was confirmed in the 2017 Addendum for the revised Proposed Submission Local Plan (Conclusion, page 2).

13. The Local Plan therefore aspires to a very substantial increase in the capacity of the A3, not least to facilitate car-borne travel to and from the major developments planned at Blackwell Farm (and Gosden Hill Farm). The Spatial Vision states: “The Department for Transport’s Road Investment Strategy includes schemes for the A3 Guildford and the M25 Junction 10/A3 Wisley interchange. Early, targeted improvement schemes to deliver road safety and some congestion relief on the A3 in Guildford will be delivered within the plan period.”

Paragraph 4.6.14 specifically explains the intention of Policy ID2 ‘Supporting the DfT’s “Road Investment Strategy”’ as including the identified:

“Scheme with construction anticipated to commence in Road Period 2 (2020/21 to 2024/25):
- A3 Guildford – improving the A3 in Guildford from the A320 to the Hogs Back junction with the A31, with associated safety improvements.”

14. In the last twelve months, the likelihood of any of this happening has been slipping away. The Local Plan has now been altered with the deletion from paragraph 4.6.18 of the option of a tunnel under Guildford, so that a road widening scheme is now the most likely option (even if a tunnel remains the Borough Council’s preferred option – see Topic Paper: Transport paragraph 5.101). Exactly what is intended is still hugely unclear: the Infrastructure Schedule for this project in Appendix 3 shows that what is proposed is so vague that it may cost anything between £100m and £250m (project SRN5). Only a brief examination of the A3 through Guildford will in any event show just how difficult, costly and enormously environmentally damaging would be any attempt to add significant extra capacity in each direction to the A3.

15. Also deleted is paragraph 4.6.17 which had stated “Guildford Borough Council and Highways England are in the process of agreeing a Statement of Common Ground which sets out assumptions regarding both the performance and safety outcomes that the RIS schemes can be expected to realise”. This is said to be because an SoCG is likely to be agreed closer to the Examination (Topic Paper: Transport paragraph 5.14), but we would not be surprised if Highways England is unable to make the commitment the Borough Council seeks.

16. Highways England itself is doubtful about how much can be achieved on the A3 and by when. Its response to the Proposed Submission LP on 18 July 2016 stated: “There is still a level of uncertainty on precisely what improvements on the A3 can be delivered and the quantum of growth any potential improvements will facilitate during the Local Plan period.” A Technical Note supporting that submission, prepared by Mouchel, was more precise:

“It should be noted that the A3 RIS 2 scheme is not a committed scheme and no funding has been allocated at present. The details of the RIS 2 A3 Guildford scheme itself are not yet known and so the modelling and testing of an A3 scheme at this stage is considered premature. As such Highways England's view is that this scheme cannot be relied upon by Local Plans to form mitigation for the development proposals.”

17. So far as we are aware, this remains the position in July 2017. The response subsequently advised that the inadequate evidence base meant that the Plan was considered unsound.

18. Guildford BC found this response hugely inconvenient and persuaded Highways England to withdraw this statement after a meeting on 1 September 2016. Highways England’s letter on 5 October 2016 doing this stated instead (with our emphasis added):

“You will be aware that Highways England is currently developing options for a potential scheme on the A3 in Guildford, capable of being delivered in the next roads period (2020-2025), subject to the normal value for money being applied. The scheme proposes widening the existing carriageway to provide additional capacity and safety improvements between the A31 Farnham Road and the A3/A320 Stoke Road. The design of such a scheme is complex and needs to consider a number of potential options, a process which takes time to complete. We will continue close working with Guildford Borough Council and Surrey County Council to progress the development of the potential scheme.

We note that the delivery of housing in the later stages of the plan period is dependent upon a major improvement to the A3 through Guildford. It is essential that the Local Plan provides the planning policy framework to ensure development does not come forward in advance of critical infrastructure. As a result of clarification received at our recent meeting, it is now
understood how the Local Plan intends to do this. Therefore we wish to formally withdraw our representation to this policy.”

[continued...]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2600 Respondent: 15275009 / Compton Parish Council (Fiona Curtis) Agent: Green Balance

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

[continued]

19. While Highways England is urging caution, Guildford’s Local Plan continues to make highly questionable assumptions. On timing, Appendix C claims that the A3 capacity increase will be ‘delivered’ between 2023 and 2027. This conflicts with paragraph 4.6.14 of the Plan (above) which expects construction to begin three years earlier. Delivery in 2023-27 is itself barely consistent with the Council’s own Topic Paper: Transport at paragraph 5.88, which reports that “Highways England has advised that, if a scheme is approved with funding agreed, construction is unlikely to be start[ed] until 2024 at the earliest, with construction taking 2½ years.” This would mean that the capacity would only become available in 2027 at the earliest, in effect postponing by some years the Plan’s aspiration for A3 widening.

20. On funding, there is no clarity where the money for A3 widening would come from, even if it did surprisingly pass the value-for-money test. The proposed submission Local Plan has been amended from one year ago in the Infrastructure Schedule in Appendix C to give the impression that developers are now expected to foot more of the bill, further adversely affecting the viability and deliverability of Blackwell Farm. The change states the funding source will be ‘Highways England and developer funded’ instead of ‘Highways England and developer contributions’.

21. Finally, the exorbitantly expensive, damaging and disruptive widening of the A3 cannot be expected to achieve its objective of alleviating traffic flows sufficiently to accommodate effectively traffic from Blackwell Farm. Congestion will, remarkably, be worse with the A3 widened than without it. The SHAR reports in paragraphs 4.8.4-6:

“4.8.4 Table 4.1b shows in the PM peak that while the network performs better in Scenario 5 [i.e. with the A3 widening in place] compared with Scenario 3, it is still worse than in Scenario 1 with vehicle hours higher and vehicle speeds lower by 12% and 2% respectively.

4.8.5 As noted above in Section 4.5, the capacity increases on the M25 and A3 result in some high flow increases as trips re-route to make use of the improvements. In turn, this affects roads approaching the A3, such as the A320, A31, A25 and B3000. These also see high flow increases with some, such as the A320, experiencing a significant deterioration in the Level of Service.

4.8.6 It should be noted that despite these improvements, Figure 4.7 shows the A3 is still operating overcapacity with resulting impacts on congestion.”

22. The Borough Council’s own evidence in both the SHAR and Arup report is that widening the A3 will increase congestion in the town rather than relieve it, with associated deterioration in air quality, noise impacts, land use impacts and severance. Blackwell Farm would damage the whole of Guildford. The likelihood of the A3 capacity being increased is less
now than it was one year ago. So far as we can see, the ‘do nothing’ option for the A3 remains squarely on the table and is an increasingly likely outcome.

23. In summary, the evidence on the A3 consolidated during the last year shows that it is currently simply not known:
– if a suitable widening scheme can be designed and if so how much it would cost;
– whether the scheme would meet ‘value for money’ tests;
– whether the money for it could be found;
– whether the A3 capacity could be increased in time to assist the development of Blackwell Farm during the Plan period, as the earliest provision date would be 2027 (and probably later).
Finally, even if built, the widening of the A3 would generate congestion in Guildford rather than relieve it and would itself be even more over-capacity than it is now. The Borough Council’s reliance on the A3 capacity improvement is foolhardy in the extreme. Not proceeding with the Blackwell Farm development would be a far superior option.

24. The Council recognises that the Blackwell Farm development cannot proceed until the A3 has been widened, but realises that this cannot be achieved until, at best, near the end of the Plan period. As a result of the lack of progress in agreeing A3 capacity increases, the rate of provision of houses in Policy S2, which was back-end loaded in the 2016 Proposed Submission, is now in the 2017 Proposed Submission still more heavily skewed towards the end of the plan period. The 2019-20 provision has been dropped from 500 to 450, while the annual provision in the last three years of the Plan has been raised from 790 to 850. There is insufficient evidence to show that 850 dwellings per annum could be constructed and sold in the Borough in those last three years: the numbers reflect not how the housing market works, but the contortions which the Council has gone through to square its housing provision numbers with the aspirational timetable for the widening of the A3. A far superior option in both housing and transport terms would be to abandon both the Blackwell Farm development and the A3 widening (which in part is justified by Blackwell Farm as well as facilitating it).

Access from the A31 Hogs Back

Junction with the A31

25. The principle of a new signalised junction on the A31 to facilitate access to Blackwell Farm is project LRN3 in the Infrastructure Schedule. The Plan accompanying Policy A26 Blackwell Farm is unchanged from June 2016. It continues to show a road access at a widened junction of Down Place with the A31, passing over the A31 slip road onto the A3 northbound. Our response to the June 2016 Consultation demonstrated, in a commissioned report from transport specialists, that the proposed signalised junction at Down Place with the A31 would be most unlikely to function effectively. Furthermore, Surrey County Council’s Strategic Highway Assessment Report June 2016 shows that the new junction would cause all users on average a 35 second delay compared with no junction (Table 4.11). In the last twelve months the Borough Council has been forced by a Freedom of Information request to release a sketch map provided by the University of Surrey showing the latest proposals for this access. This involves a junction slightly west of the site originally intended but shows no distance measurements. Also it shows an extra westbound lane for traffic on the A31 over-bridge but no bridge widening. There appears to be no proposal to co-ordinate this junction with improvements to the Down Lane junction on the opposite side of the A31 slightly to the east, even though the creation of the Down Place access could ordinarily be expected to generate significant additional use of Down Lane.

26. The lack of transparency by the Council is significant: unless demonstrated otherwise, we consider that the proposed access at Down Place is likely to remain impractical for the following reasons.
– There does not appear to be sufficient road width for the proposed junction.
– A signalled junction is likely to be over-capacity at peak periods.
– Travellers leaving Blackwell Farm this way in the morning peak will suffer major tailbacks due to the overloaded A31 eastbound inhibiting left turns (the peak flow direction).
– Widening of the A3 over-bridge may well still be necessary at vast cost.
– Only a very environmentally damaging roundabout in the AONB on the top of the Hog’s Back (previously opposed by Borough Councillors) could be sure of accommodating likely flows.

Access road between the A31 and Blackwell Farm
27. Project LRN4 in the Infrastructure Schedule is an access road at Blackwell Farm with a through link to Egerton Road. The Plan continues to give the misleading impression that “The design of the improved Down Place access road or a new adjacent parallel access road will be sympathetic to its setting variously within the AONB and AGLV” (Infrastructure Requirements item 2). A significant road connecting to the A31 could not possibly be achieved by an ‘improved Down Place access road’, the route of which is narrow, lined by mature trees on both sides, and includes a significant sharp bend, while any alternative could not possibly be sympathetic to the AONB and AGLV. The construction of an access road through an AONB to a new urban extension would be major development in its own right. This could only be justified in AONB policy terms if there were exceptional circumstances. There are none of these and none are claimed or demonstrated.

28. The principal difficulty which has arisen in the last year regarding the new link road is that the Council has been unable to find a workable solution for the local road network. The Council wants residents of Blackwell Farm and employees at the Research Park to be able to enter and leave either in the Guildford direction or the A31 direction, but it does not want most other drivers to use the same roads if they don’t really need to be there. There appear to be two intentions: to constraining drivers who are just passing through – so as to avoid rat-running (especially necessary if a direct through route can be found south of Manor Copse) – and to avoid attracting drivers who currently use Egerton Road. In both cases the intention is to avoid causing adverse network effects if drivers divert onto the new link, e.g. rat-runners overloading Egerton Road still further, or the new access prompting more traffic on the A31.

29. Policy A26 in the June 2017 Proposed Submission Local Plan sets out its solution: to provide a new route “between the A31 Farnham Road and Egerton Road” for “employees and emergency vehicles” (only) to the Surrey Research Park, the University of Surrey’s Manor Park campus and the Royal Surrey County Hospital. We address in this section the practicality of selecting users for the public highway. However, the matter is also linked to the separate issue of how to link Blackwell Farm into Egerton Road, the main road into Guildford (see paragraphs 47-50).

30. We have tried for the last year to obtain from Guildford BC and the County Highways Authority an understanding of exactly how users of the proposed new road network would be restricted to those people deemed suitable, with everyone else barred. No credible explanation has been provided. The matter is completely ignored in the Borough Council’s Topic Paper: Transport (June 2017) and Strategic Highway Assessment Report Addendum (June 2017), and is restated but not explained in Guildford Borough Transport Strategy 2017 (June 2017). This is an issue which cannot be brushed under the carpet because it lies at the heart of the credibility of the link to the A31.

31. The local authorities have been thinking about the issues raised but failed to find an answer after another year of investigating. Surrey County Council has indicated that its preferred option is the use of Automatic Number Plate Recognition (ANPR) coupled with a permit system. However, there is a general right of public access on the public highway without the State snooping on who uses it by means of cameras, so the legality and practicality of any control system remains to be resolved. For this method to function, therefore, we anticipate that cameras would have to monitor passage on private roads, raising the prospect that Blackwell Farm might not be fully accessible on the public road network. It remains unclear what would happen to drivers whose number plates were not ‘authorised’ to use the road, or how they could be discouraged from arriving in the first place. If there was a system of fines for unauthorised use of the road link, this would require the co-operation of public authorities in perpetuity (which would need to have ongoing funding from the development). With private roads, control of the network would be lost to a private interest whose priorities might not always be the same as those of a public authority. Rights of access to the private roads could at any time be changed by the landowner by reference to which vehicles were allowed passage, when, at what cost, or in other ways. We would expect an urban extension to Guildford reliant on access and egress by private roads to be fundamentally unacceptable.

32. It is unclear whether Guildford BC appreciates the impracticability of the proposed differentiation between acceptable and banned users of the road. There will be thousands of ‘legitimate’ drivers resident in the Blackwell Farm housing development. There will be many hundreds of employees in the Research Park and its proposed extension. There will be hundreds of staff on the Manor Park campus and at the Hospital. Identifying these individuals and, specifically, the cars they will be driving would be a nightmare, made worse by staff turnover and churn in the occupancy of the housing development. Legitimate individuals may have good cause to use alternative cars. The newly introduced secondary school would be largely (two thirds) for the benefit of non-residents of the Blackwell Farm development, so large numbers of drivers can be expected to arrive from elsewhere using the link road, and would need to be registered. Many others will claim legitimate cause for registration on the ANPR system, such as staff at the Nuffield Hospital as well as the County Hospital, employees of shops and services in the area, taxi drivers and so on. The system of registration would become very
large and unwieldy, requiring continual (and rapid) update, at real cost. A reliable and effective appeal system would be needed, but the frustrations of both registered and especially non-registered users of the road are still entirely foreseeable.

33. As the transport consultant to Compton and Worplesdon Parish Council notes, the inevitable complexity of an ANPR process raises a series of questions related to site deliverability such as:
   i) Will the developer provide for the financial enforcement costs of the link road restrictions in perpetuity? Is this included within the £20million cost for LRN4?
   ii) Will Surrey Police provide the enforcement of the ANPR in perpetuity?
   iii) How will all of the people who will be granted access to use the road be differentiated from through traffic?

34. Answers to these questions and resolving other practical concerns are fundamental to the successful deliverability of the vehicular link road and the urban extension as a whole. The road must not attract unwanted road users, but must still achieve the aim of serving all of the desired users. So far the Council has offered no commentary at all on how these awkward issues might be resolved, or on how the use of private roads to achieve a public purpose can be made to function without unacceptable risks of unilateral action by the landowner.

35. The outcome seems to us clearly inevitable if a link road is built. It will not be workable. Instead of a costly system of registration, fines, appeals, etc., the greater likelihood is that the foreseeable cacophony of opposition to a system which appears indiscriminate, unfair and ineffective will cause the system of ANPR and registration to be abandoned in a short order of time. All the disadvantages of the link road to the wider network would then be realised.

Impact of the link road on air quality in Compton

36. New information on air quality has become available since the consultation on the Proposed Submission Local Plan in 2016. In particular, Guildford Borough Council has issued an admirably brief and clear 2016 Air Quality Annual Status Report, September 2016. This shows that a specific area of the B3000 road through the village of Compton (in whose parish Blackwell Farm partially lies) has one air quality monitoring position which consistently reveals concentrations of Nitrogen Dioxide (NO2) well in excess of the legal limit adjacent to a dwelling (and the highest figure in the Borough). This is the only location in the Borough where this combination arises. (There were two other places with lesser exceedance of the legal limit, but one was located well away from dwellings and the other was unreliable having only 33% data capture rather than the 75% required.) Other monitoring positions nearby in Compton had NO2 pollution approaching the legal limit.

37. There is no doubt whatever about the cause of the pollution problem: through traffic passing through the village. Large numbers of cars pass through and lorries on the relatively narrow road can cause additional congestion. Further monitoring and modelling is taking place to ascertain whether any further action is required, notably using Advanced Dispersion Modelling Software (since June 2016). The Guildford Borough Transport Strategy 2017 reports that in respect of Compton “The Council is considering whether to declare an Air Quality Management Area and, working with Surrey County Council, will use the results of an ongoing study looking at the pattern of daily exposure to design and implement appropriate mitigating measures” (page 19). The Council has proposed no means of achieving in the short term a permanent reduction in traffic volumes through Compton. On the face of it, an AQMA may well therefore already be needed: under its legal duties the Council must designate one if it is unlikely that the objective values (i.e. less than 40g/μm3) will be met in a given timescale, and the Council must then prepare an Air Quality Action Plan (AQAP) with the aim of achieving value objectives.

38. The vehicle count through Compton will rise alarmingly if the Blackwell Farm development and the associated A3 widening are built, inevitably necessitating an AQMA and with little or no prospect of an AQAP being effective. For vehicle impacts, the SHAR treats development of Blackwell Farm and accesses to it as a two-stage process: ‘Scenario 3’ involves the construction of key highway schemes providing access to large development sites (incl. Blackwell Farm) and local highway schemes, while ‘Scenario 5’ involves the widening of the A3 at Guildford (A320 Stoke interchange junction to A31 Hog’s Back junction). The traffic consequences of each are modelled separately. In practice, as established in paragraph 12 above, there is common ground between the Borough Council, County Council and Highways England that the Blackwell Farm development cannot proceed until the A3 has been widened, so in practice the highways impacts of the site access road and A3 widening are additional if Blackwell Farm is to proceed.
39. The SHAR shows in Figure 4.3 for the morning peak hour that 275 vehicles will leave the A31 at Down Place (for Blackwell Farm, the Surrey Research Park and County Hospital). Paragraph 4.7.5 suggests that these are trips which primarily have their origin in the west, (though the likelihood is that many of them will have actually their origin in the south: traffic from Godalming and Farncombe, for example, could access the A31 at the Puttenham junction and then head for the Research Park or Hospital while avoiding Guildford.) In short, a proportion of the 275 vehicles using the Down Place junction under Scenario 3 will have passed through Compton. Unfortunately, the network effects diagram shown in Figure 4.3 does not extend southwards to Compton to identify an indicative number.

40. The SHAR then indicates the impact of Scenario 5 compared with Scenario 3. This is reported for Compton in Table 4.5, showing that the B3000 through Compton will have one of the highest absolute increases in flow arising from the widening of the A3, with an additional 145 vehicles per hour in the morning peak, representing a further 16% increase in traffic through Compton. The Table notes that both under Scenario 3 (even without the A3 widening) and under Scenario 5 the Level Of Service on the road would be category E: ‘Unstable flow operating at capacity’. The outcome could be even worse: the SHAR notes at paragraph 4.7.5 that potentially the number of drivers attracted to use the new Down Place to Blackwell Farm link could be somewhat higher as the model cannot accurately reflect the queuing that occurs on the nearside lane of the A31 as it approaches the merge with the A3. If so, the numbers passing through Compton could be expected to increase proportionately.

41. The evidence is clear that the combined effect of the Local Plan’s proposals for the Down Place link road to Blackwell Farm and the A3 will greatly increase traffic through Compton which in turn will have an inevitable and appalling impact on air quality (which already exceeds legal limits at one location). Despite this, the Council is in denial about the air quality impacts of its Proposed Submission Local Plan 2017. Aecom have prepared for the Borough Council an Air Quality Review of Guildford Borough proposed Submission Local Plan: Strategy and Sites “June 2017”, but this completely fails to appreciate the relationship between the Blackwell Farm development, the proposed road infrastructure developments and air quality at Compton. It provides a series of unwise statements:

(i) “it is predicted that if little development takes place within the area and vehicles emissions are reduced by technological advances these objective exceedance should reduce to below the objective in to the future, without additional measures being required locally” (section 2.3). The reference to little development in the area is absurd: a major urban extension is proposed in the Parish. The suggestion that technological advances in emissions will solve the problem is fanciful in anything other than the long term, whereas there is an immediate need for action to reduce vehicle passage through Compton.

(ii) “The assessment identified a risk of exceedance if traffic flows, primarily on the B3000, increased. The area was not declared as an AQMA as the assessment noted that emissions from traffic were expected to decrease into the future which should lead to a decrease in NO2 concentrations measured in the area” (section 4.1). This finding is simply wrong: Table 4.5 of the SHAR anticipates a 16% increase in traffic in Compton from the A3 widening, not counting any increase generated along the Down Place link road.

(iii) A review of Policy A26 Blackwell Farm (section 5.2.2.1) recognises that “A large development such as this is likely to have an impact on local air quality as there are likely to be large changes to traffic flows on nearby roads and thus impacts on pollutant concentrations”, but failed to realise the consequences for Compton, even though this is nearby and clearly the place with the worst NO2 pollution recording in the Borough (which should obviously be one of the first places to examine for air quality consequences).

(iv) A review of the air quality impact of the Local Plan on Compton (section 5.2.4) similarly fails to appreciate the evidence. This states in full: “There is one large land allocation within the parish of Compton, A26 Blackwell Farm, discussed above. The additional traffic flows predicted to be generated by this development are not predicted to have a significant adverse effect on air quality in the area of the village of Compton. There are no other large allocations local to Compton Village. As a result the implementation of the GBC Draft Local Plan should have little effect on future traffic flows through the area and thus negligible impact on local air quality.”

(v) Rather than address the air quality consequences of Blackwell Farm at the Local Plan stage, when decisions can still affect air quality in Compton, Aecom choose to defer any consideration of the issue until a time when little can be done about it. On four occasions in the Executive Summary the issue is recommended as a matter which can be dealt with ‘through the planning application process’. Once allocations of land are made for development, strategic reasons for
resisting them (e.g. on air quality grounds) are typically overruled as matters which should have been resolved at the plan-
making stage. Leaving air pollution consequences of proposed development until the planning application stage is an
exercise in trying to sweep the issue under the carpet.

42. Aecom’s recommendations in section 5.4 recognise that “The increase in traffic flows associated with the
implementation of the Draft Local Plan are predicted to be in the region
of 12,500-17,000 vehicles per day on the Guildford Bypass [A3]”, but seem to assume – extraordinarily – that no extra
vehicles will pass through Compton (despite the evidence in the SHAR). In our view, the Aecom report and its
recommendations represent a significant failure to respond to clear evidence of the air quality damage that the Blackwell
Farm development as a whole and the associated A3 widening would inflict upon Compton, about which little could then
be done in the short term. We wholly disagree with its approach, which could threaten life-expectancy in Compton.

43. It is hardly surprising that air quality is barely mentioned in the Sustainability Appraisal and treated as a minor issue, as
Aecom also prepared this for the Borough Council: paragraph 10.7.1 final indent merely recommends that ‘detailed
modelling’ is undertaken close to where very large increases in traffic flows are expected. Paragraph 10.7.7 concludes
“Proposed changes to the spatial strategy have little or no implications for health, whilst proposed changes to site specific
policy (particularly regarding air quality; see discussion above), responding to the Air Quality Review (2017), are
supportive of good health.” Again key decisions are to be left until too late until the planning application stage, with both
the SA (at paragraph 10.7.1) and the Air Quality Review (at page 5) recommending that ‘potential air quality issues’ should
be added to the list of ‘key considerations’ at the end of the main urban development allocation policies, including Policy
A26 Blackwell Farm. This has been taken up by the Borough Council. However, the SA fails to address the key issue that
needs resolution now: how to stop additional traffic being attracted through Compton or reduce it.

[continued]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  LP2017 - Response to GBC Reg19 by SHB ComptonPC Jul17 v4 - Green Balance.pdf (625 KB)

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**Comment ID:** pslp172/2601  **Respondent:** 15275009 / Compton Parish Council (Fiona Curtis)  **Agent:** Green Balance

**Document:**  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

[continued]

Connection to Guildford

*Linking the Research Park Extension to the road network*

44. The expansion of the Surrey Research Park and the creation of the Blackwell Farm estate are treated as part of the same
development in Policy A26. In access terms it is more sensible to consider them separately. The Research Park proposal is
for an Extension of 10-11ha, which would be to the north-west of the current Research Park. Access would be straight-
forward from Guildford: via Egerton Road and Gill Avenue, via the roundabout serving the Research Park by the Occam
Road/Priestley Road loop, and by making an extension to Stephenson Way. A road serving the Extension could be taken
through the mature hedgerow separating the existing Research Park from Blackwell Farm at a point close to and parallel to
the railway line. Stephenson Way has been constructed to allow further extension of the roadway in this location (also
giving access to some of the last remaining large vacant sites on the current Research Park). Proposals for the Sustainable
Movement Corridor in the June 2016 ‘Progress update’ as part of the evidence base for the Proposed Submission Local
Plan at that time were consistent with this. They showed in Figure 5 a schematic route for the SMC. This is reproduced on
page 16 of the Guildford Borough Transport Strategy 2017. At its western end this turns north from Gill Avenue,
apparently to follow Occam Road and Priestley Road, before making a westward thrust into the Research Park extension
area (though whether north or south of Surrey Satellite Technology is difficult to say from the scale of the plan provided).
So far as the Research Park Extension is concerned, that would seem to be an understandable direction in which to take the
Sustainable Movement Corridor.

45. However, this arrangement would introduce development into Green Belt and the setting of the AONB at Blackwell
Farm, breach the excellent existing screening of development from the west, add substantial additional traffic to the heavily
congested Egerton Road, and in all likelihood be opposed by existing users of the Research Park who would be unlikely to
want a significant thoroughfare in their midst. We therefore consider this proposal unacceptable. We note, too, that the
proposed SMC may now stop short of the Research Park Extension (at the roundabout on Gill Avenue at the top of the
hill), as indicated in the Sustainable Movement Corridor – Update 20 February 2017 in Figure 4. How or whether the SMC
would link into Blackwell Farm or the Research Park Extension has become a mystery.

46. We do not accept that the sensibilities of existing staff in the current Research Park should dictate the most appropriate
access route to a Research Park Extension. However, if the intention (and this is unstated in the Local Plan) is that the
Research Park Extension could only proceed if a new road link was made to it from the A31, to avoid access only through
the existing Research Park, there would be even less justification for the development going ahead. Not only would the
scheme still intrude into Green Belt and the setting of the AONB at Blackwell Farm. It would also be partly responsible for
requiring major development of a road in the AONB and so could only be justified in ‘exceptional circumstances’ (which it
has neither claimed nor demonstrated). Given that the Extension would now be physically separate from the existing
Research Park, it would be unable to claim Blackwell Farm as an essential location. So far as we can see, the Extension
does not need to be in this location at all, and a more fundamental review of its future location would be in order. That
would also help avoid traffic growth on Egerton Road.

Linking Blackwell Farm to Egerton Road and the Tesco roundabout

47. How the Borough Council and the County Highways Authority propose to link the Blackwell Farm development into
Egerton Road preferably via Gill Avenue, in accordance with the Proposed Submission Local Plan 2017 Policy A26,
remains unclear. It is important to appreciate that, after another year of investigation, the Council is no closer to finding a
workable means of channelling traffic out of Blackwell Farm towards Guildford or back into it, let alone linking this access
with the proposed new access to the A31. One option has recently been lost by the construction of the substantial School of
Veterinary Medicine on the line of one possible access road. We consider the Proposed Submission Local Plan to be
derelict in its duty to demonstrate how such a major urban development on the edge of Guildford can in reality be linked
into the fabric of the town. The Borough Council is plainly having great difficulty finding a suitable access route. We
strongly recommend that the Local Plan should not be submitted for Examination unless this route can be clearly identified
first.

Impact of Blackwell Farm and the Research Park development on the local road network

48. Egerton Road is one of the worst congestion hotspots in Guildford and the wider area. Egerton Road provides the main
access to the Surrey Royal County Hospital and a superstore, and the only access to Surrey University’s Manor Park
student village, Surrey Sports Park and the entirety of Surrey Research Park. The demand for access to all these
Save Hogs Back & Compton PC 16 by Green Balance
destinations is growing, notably with building programmes at Manor Park and the Research Park. The high level of existing
congestion will therefore get worse, even before Blackwell Farm is contemplated. Egerton Road is accessed principally
from Guildford to the east but its capacity is fundamentally constrained by the pinch-point of the A3 underpass, which is a
single-carriageway road capable of providing for two lanes of cars each way (but not wider vehicles). Overloading of the
roundabouts at either end of the underpass, which both have links to the A3 and other destinations, also act as pinch-points
for traffic from numerous sources and cause traffic to back up onto the roads into them (even onto the A3). The likely
additional traffic generation at the Egerton Road/Gill Avenue crossroads, immediately west of the Tesco Roundabout, was
noted in paragraph 6 above.
49. The concept of adding the major Blackwell Farm estate and a 10-11ha Research Park extension, both accessed from Egerton Road, without any significant vehicle capacity increase on Egerton Road itself, seems astonishing to the point of being hardly believable. The Strategic Highway Assessment Report June 2016 accompanying the Proposed Submission Local Plan a year ago states of the Blackwell Farm development: “in Scenario 2, without either new highway schemes or specific access arrangements, trips from Blackwell Farm load onto the A31. But with the access arrangements modelled together with an access road through the development to the Surrey Research Park, this assessment indicates that significant pressure could be placed on Gill Avenue, the Hospital junction and other parts of the network in that area” (paragraph 4.5.4). Paragraph 4.9.5 of the SHAR specifically identifies that “the additional access to and from the Blackwell Farm development via Gill Avenue results in a significant increase in trips on this part of the network. This is, in turn, impacting on junctions for which there are no schemes proposed at the moment, highlighting where additional improvements may be necessary. An example of this is the Egerton Road/Gill Avenue junction adjacent to the Royal Surrey County Hospital.”

50. In addition to this, in the last twelve months, the Proposed Submission Local Plan 2017 has upgraded the importance of Egerton Road to the purpose of providing access to Blackwell Farm, compared with the 2016 Plan, in that the alternative proposed access to Blackwell Farm via the A31 is no longer designated as the ‘primary’ access and Egerton Road is no longer designated the ‘secondary’ access. They now have equal status. Whereas this properly reflects the implausibility of an acceptable link to the A31, no change whatever has been proposed to Egerton Road to accommodate such extra traffic as may now be expected to take this route (which is unspecified). In our view, the additional traffic congestion impacts on an already overloaded local network are so foreseeably dire that we strongly recommend the Blackwell Farm development should not be taken forward.

Sustainable Movement Corridor

51. Back in 2014 Arup prepared a report Guildford Town and Approaches Movement Study for the Borough Council, a vision statement on transport in Guildford to 2050, which included a very broad indicative route at a scale that was difficult to apply on the ground. This has been endorsed by the Council. The purpose was to facilitate sustainable movement, strongly emphasising public transport, walking, cycling and demand management at the expense of travel by private car. The centrepiece of the scheme was a corridor segregated to be available to fast buses (and possibly trams), cyclists and pedestrians, linking the key existing areas of the town that are drivers of growth. There would be new bridges over the railway (in the town centre) and over the River Wey (across the floodplain near Stoke Lock). The estimated total cost was broadly £75-100 million though clearly not costed in detail. Cars would be banned from the Corridor which, because it would be based on using existing roads, some of them major roads, would represent a highly significant reallocation of space away from cars to buses, cycles and walkers, with consequent impediments to car usage. Car parking charges would be increased, 20mph zones introduced, some roads be closed to through traffic and others pedestrianised. The Proposed Submission Local Plan supports this kind of corridor but, strikingly, none of these intentions and assumptions is made clear in the 2016 or 2017 Consultations.

52. The 2016 Consultation proposed a Sustainable Movement Corridor, included in the Plan at the last moment (Spatial Vision, Policy I3 and paragraph 4.6.24). Various land allocation policies required co-ordination with the Corridor. Paragraph 4.6.24 explained that the Sustainable Movement Corridor would link major developments to Park-and-Rides, including Blackwell Farm (at its western end), and stated that the Corridor would be ‘largely on existing roads’. ‘Route sections’ were listed in the Infrastructure Schedule (Appendix C) with six itemised segments with some broad cost figures suggested (£80-90m in total). No route for the Corridor was included in the Plan, but instead the evidence base included a Progress Update on the Sustainable Movement Corridor scheme (GBC, June 2016). This showed a revised figurative route and possible road layouts at some key junctions and sections. It showed variations from the Arup study, notably with: a spur to Slyfield based on the existing A320 rather than a river crossing further east and also a lengthy new corridor up the A3100 to Gosden Hill Farm. The Arup Corridor would be downgraded in many lengths to shared roadspace with existing traffic (i.e. normal roads) but with bus priority measures. A land bridge over the A3 to provide a connection to the Research Park was downgraded to using the existing Egerton Road underpass: the recommendation was “to consider further the potential for tidal bus lane on Egerton Road as it passes under the A3 trunk road, with signalised control at either end controlling its use by buses, whilst retaining two working lanes of general traffic. It would be anticipated that the tidal bus lane would be used westbound in the morning peak period and eastbound in the evening peak period.” Changes to the Tesco roundabout would also be needed. Development would begin in the town centre and be phased later for other sections (to 2033).
53. The 2017 Consultation has made little progress on the Sustainable Movement Corridor. Policy ID3 now mentions a Supplementary Planning Document on the topic, but there is no sign of this even in first draft despite the passage of another year. This is an unacceptably inadequate basis upon which to plan for major urban development at Blackwell Farm. However, a further report Sustainable Movement Corridor – Update published in February 2017 does for the first time include a published small-scale street map on which the Sustainable Movement Corridor (SMC) is superimposed and clearer proposals for an initial western section. However, the Council clearly have insufficient confidence in this to include it in the Local Plan. The 2017 Update shows changes from the 2016 Update, notably with an additional crossing of the railway beside Yorkie’s Bridge and an additional north-south corridor along Woodbridge Road and Onslow Street between the A25 and the gyratory.

54. The Sustainable Movement Corridor will measure its effectiveness by a substantial degree of modal shift away from cars and towards sustainable transport modes. The starting point for analysis is that the Strategic Highway Assessment Report 2016 assumes no modal shift to sustainable modes, and so is a ‘worst case’ in respect of cars (paragraph 4.1.8). Paragraph 4.6.28 of the Proposed Submission Local Plan 2017 now states that “the site allocations and proposals in this Plan – including the significant programme of schemes to provide and improve opportunities to use active modes, bus and rail – are intended to result in a modest modal shift over the period to 2034”. However, the Council has accepted that this is unlikely to be enormously effective: the same sentence continues “we forecast that there will also be an absolute increase in overall traffic volumes.” Instead the paragraph proposes to ‘increase highway capacity’. This is a downgrading from the intentions just a year ago, when paragraph 4.1.8 of the SHAR stated “The impact of these sustainable transport schemes is expected to be significant”. What, therefore, is the Council’s objective?

55. The key section of the SMC for Blackwell Farm is the western section. At the key pinch-point of the A3 underpass, the Sustainable Movement Corridor can only function if the existing four lanes for vehicles are reduced to three, with one of these lanes taken up as a bus lane based on tidal flow routing. Space for other vehicles would be halved. The Proposed Submission Local Plan 2017 together with the main transport documents supporting it (the Guildford Borough Transport Strategy 2017 and Topic Paper: Transport, June 2017) are silent on whether this will be implemented, but as it is a key feature of the SMC, which could not function without it, we assume that this is what is proposed. Furthermore, the Tesco roundabout diagram in the 2017 Update document shows no roadspace at all reallocated to the Corridor west of this point.

56. The Council does not appear to have modelled the network consequences of creating the western section of the SMC (or any other section). With the Blackwell Farm development completed, the SHAR forecasts (Figure 4.3) that, in the morning peak hour, there would be 837 movements westbound and 636 movements eastbound along Egerton Road through the underpass (one vehicle about every 4 seconds and 6 seconds respectively). The underpass is highly unlikely to have the capacity to accept this level of traffic on a single lane each way. That would still be the case after modest modal shift had reduced the vehicle counts somewhat. It seems to us unrealistic to believe that all traffic inhibited by denial of road space will divert to sustainable modes. The more likely effect is that the SMC will simply add greatly to the predicted overcapacity on Egerton Road, with knock-on effects through the network. The principal effect of the SMC in the Blackwell Farm area is therefore likely to be to make traffic congestion worse rather than better if the development is built.

57. The footpath and cycleway on the north side of Egerton Road, segregated from traffic but not from each other, would be maintained under the proposals in the 2017 Update, though the current design is cramped and mostly unattractive. The footpath and cycleway cease east of the Tesco roundabout, so walkers and cyclists have to fend for themselves when crossing the Ashenden Road arm of the Tesco roundabout. No improvement even to this basic problem is proposed in the Plan. The Plan needs to be clearer about what if anything it is actually proposing in order to encourage walking and cycling to and from the Blackwell Farm development.

58. If the modal shift fails to happen, the level of congestion in Guildford will become significantly worse. Modal shift is the only means by which the Council can find any practical means of moving additional people at scale into and out of Blackwell Farm (and the associated 10-11ha expansion of the Research Park). Even so, given the existing very high levels of congestion and over-capacity on Egerton Road and Gill Avenue, especially in peak periods, there is no certainty that there will be sufficient roadspace for vehicles, people and goods to reach the Blackwell Farm development even after the Sustainable Movement Corridor has taken a proportion of travellers (itself taking up roadspace).

59. The Council has not demonstrated a credible strategy for actually achieving modal shift in practice, notably by removing both roadspace for cars and destination car parking spaces. Modal shift is not mentioned in Policy A26, despite its imperative importance to the delivery of Blackwell Farm. The strong impression given by the Plan is that the SMC has
been greatly downgraded from the original proposals by Arup to which the Council subscribed, and is therefore unlikely to
deliver the modal shift which is essential for the development proposals in the Plan to be feasible. It seems to us that the
likelihood is that the Sustainable Movement Corridor in the Blackwell Farm area will be massively inadequate. As the
Council’s heart does not appear to be in modal shift, we consider that the Blackwell Farm proposal will be undeliverable
and we recommend that the proposed allocation in Policy A26 is withdrawn.

60. The purpose of the SMC can only be achieved by upsetting car drivers. However, the Plan strongly emphasises
accommodating traffic generation from proposed development with figures apparently incorporating: no modal shift at all;
a sustained aspiration for a major increase in capacity on the A3; and continued investment in local road capacity
improvements. We conclude that the Sustainable Movement Corridor has already been compromised, will fail to make
discernible impacts on existing congestion, and will therefore not have anything like enough impact on travel patterns to
accommodate the people and goods movements arising from 1,800 houses at Blackwell Farm. We recommend that the
Local Plan should not be submitted for Examination without deletion of the Blackwell Farm proposal in Policy A26.

Funding the transport infrastructure necessary for Blackwell Farm

61. We pointed out in our submission a year ago that the scale of financial support expected from the developers of the
Blackwell Farm site for the delivery of road infrastructure alone was far above the amounts normally expected. In the last
year the obligations upon them have increased. The Proposed Submission Local Plan has now been amended in the
Infrastructure Schedule in Appendix C. Proposals affecting the A3 were noted in paragraph 20 above, to which Blackwell
Farm developers will be a party. Other new financial commitments specific to Blackwell Farm are:
– Project BT6 ‘Significant bus network serving the Blackwell Farm site and key destinations including the existing western
suburbs of Guildford and the town centre to be provided’ is a new requirement in 2017, which must be entirely funded and
delivered by the developer, at a price which is still to be confirmed, and therefore an open-ended commitment at present;
– Project LRN5 ‘Interventions to address potential highway performance issues resulting from development at Blackwell
Farm site’, which must be entirely funded by the developer, has seen its cost increase from £5m to £10m;
– The developer rather than Surrey County Council will now be responsible for the delivery of Project LRN3 ‘New
signalised junction from Blackwell Farm site to A31 Farnham Road (to principally serve Blackwell Farm site)’, which is
likely to increase financial obligations on the developer;
– The developer rather than Surrey County Council will now be responsible for the delivery of Project LRN4 ‘Access road
at Blackwell Farm site with through link to Egerton Road (to principally serve Blackwell Farm site)’, which is likely to
increase financial obligations on the developer;
– The developer rather than Surrey County Council will now be responsible for the delivery of Project LRN5 ‘Interventions
to address potential highway performance issues resulting from development at Blackwell Farm site’, which is likely to
increase financial obligations on the developer;
– A “Necessary and proportionate contribution to delivering Guildford West (Park Barn) railway station” towards the
estimated £10m cost of Project NR2 will still be required from the Blackwell Farm developer (the only named developer
required to contribute) in accordance with Policy A26 Infrastructure Requirement (7): this assumes greater importance now
that the station merits its own Policy A59 (see paragraphs 63-64 below);
– The funding arrangements for SMC1 Sustainable Movement Corridor: West have been amended slightly. The change
states the funding source will be ‘Developer funded and Local Growth Fund’ instead of ‘Developer contributions and Local
Growth Fund’, suggesting that the developers will have to fund somewhat more than previously expected. The Blackwell
Farm development will be the principal contributor to this section of the SMC.

62. Transport consultants advising Compton and Worplesdon Parish Councils calculate that the transport infrastructure
alone for the Blackwell Farm development will cost about £60million, most of it up-front. This is around £35,000 per
dwelling. There will be other major costs which the developer will be required to fund, including new primary and
secondary schools and affordable housing (none of which were included in our previous costings), all of which can be very
expensive, and numerous other mitigation costs from such a major development. There is, therefore, a real risk that the
proposed development will not be viable and deliverable. If still included, the Local Plan would need to ensure that the
Blackwell Farm development complies with paragraph 173 of the NPPF on this point. In reality, in the absence of other
funding sources to provide money which the developers may be unable or unwilling to provide, the Blackwell Farm
scheme would have to fail and be deleted from the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Save Hogs Back supports this railway station in principle, irrespective of the Blackwell Farm development. It is important to appreciate that its contribution within the Local Plan period will be limited, probably not being operational until at least 2029. The Topic Paper: Transport explains at paragraph 5.31 that Guildford West (Park Barn) railway station is likely to be brought forward only in 2024-2029 because “August 2024 corresponds with the anticipated start date of the South Western franchise period subsequent to the recently awarded franchise for the 2017-2024 period. Delivery from or subsequent to 2024 allows for the servicing of the new rail stations to be included within that new South Western franchise covering the period from 2024”. On this basis, progress with the construction of a station is feasible but far from assured. In particular, although the Plan recognises the need to deliver the project by working with Network Rail, there is no indication in the Plan that Network Rail has identified the technical feasibility and cost of the project or formally committed to it. It may simply not be in a position to deliver this project.

The new railway station will create a new destination for traffic. On the south side of the railway line, behind the hospitals, there will be a requirement for disabled parking together with access for buses, taxis and passenger drop-off. This will add to the congestion on local roads, notably Egerton Road. However, the anticipated vehicle activity associated with the new station has not been included in the traffic model for the area, and this needs to be rectified urgently. This is yet another contributor to excess congestion on Egerton Road if the Blackwell Farm development were to proceed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
65. Save Hogs Back welcomes the proposed changes to Policy P1. In particular we support the more positive approach to sustaining AONB qualities and the greater attention given to protecting the setting of the AONB in paragraphs (3) and (5). We also particularly welcome the retention of the AGLV designation in the manner set out in paragraph (5).

66. We also welcome the updated clarification of the status of Areas of Great Landscape Value in paragraph 4.3.8 of the Reasoned Justification.

67. Unfortunately, the policy (particularly as amended) is not always applied through the Plan as a whole. The strategic allocation of land for housing in Policy A26 at Blackwell Farm is in direct conflict with Policy P1 as amended and is the most significant proposed release of a greenfield site that has major adverse impacts on the AONB. A small part of the allocation is also included within the AGLV. The Blackwell Farm site allocation conflicts with Policy P1 and should be removed from the Plan.

68. The proposal in Policy A26 would in summary involve:

– constructing major development in the form of a significant new access road to the Blackwell Farm development and the extended Research Park, by crossing the AONB down the steep northern face of the Hog’s Back, causing immense damage to the AONB (and increasing the impact of the development on those passing through the AONB);
– major development in the immediate setting of the AONB, in an area which (apart from some University expansion) has been relatively little-damaged to date;

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– taking land for major development which ought to be included within the AONB and has a real prospect of being so included following the Surrey Hills AONB boundary review to be carried out by Natural England (paragraph 4.3.8 of the Plan refers): an independent landscape consultancy working for Compton and Worplesdon Parish Councils applied the AONB boundary evaluation methodology in detail, recommending that Down Place and much of Blackwell Farm should also be designated as AONB.

More information on the impact of Policy A26 on the AONB was set out in section 3 of our submission in 2016.

69. We consider that the monitoring arrangements for Policy P1 are unwise as they are limited to the outcomes of appeals, over which the authority has no control. The measure is also pointless: we doubt that the Council is really saying that it would change its policy on protecting a nationally important landscape if a few Inspectors made different judgements (how many, how often?) about the application of the policy in particular cases.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp17q/148</th>
<th>Respondent:</th>
<th>15275009 / Compton Parish Council (Fiona Curtis)</th>
<th>Agent:</th>
<th>Green Balance</th>
</tr>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

70. The Guildford Borough Proposed Submission Local Plan: Strategy and Sites June 2017 is unsound for the following reasons, which are additional to those we reported in July 2016:

(1) The Plan is not consistent with national policy, in the following respect:
– Policies ID2 and A26 particularly would cause substantial deterioration in air quality in Compton, where air quality monitoring shows that NO2 pollution is already (and has persistently been) in breach of legal limits, by attracting additional...
vehicular traffic through the village to access both the A3 and Blackwell Farm/Surrey Research Park via a new road link from the A31: this is in breach of NPPF paragraph 109 policy for “preventing both new and existing development from contributing to… unacceptable levels of… air… pollution”.

(2) The Plan will not be effective, in the following respects:

– Policy ID2 is unlikely to be deliverable within the Plan period in respect of widening the A3 through Guildford, which is a precondition for implementing Policy A26. Even if it was, it would not meet its own objective of providing appropriate access to the strategic road network to accommodate future planned growth in the form of the Blackwell Farm development.
– Policy A26 will not be effective because the volume of traffic the proposed Blackwell Farm development would generate on Egerton Road (even if a link road to the A31 is also in place) would cause levels of congestion so high that the network flow would break down in this area, and the Plan proposes no remedy for this.
– Policy A26 will not be effective because the Plan has failed to identify a means of access from Blackwell Farm onto Egerton Road (Infrastructure Requirement (1)), even though this access has been upgraded in the Plan and is no longer ‘secondary’ to the link to the A31; the 1:10,000 plan accompanying the Policy shows no link at all into Guildford.
– Policy A26 will not be effective because Infrastructure Requirement (3) for a controlled road link through the Blackwell Farm development to limit the users of the road will not be implementable in practice.

Save Hogs Back & Compton PC 23 by Green Balance
– Policy A26 will not be effective because the additional road capacity needed to serve the newly proposed secondary school (Allocation item (9)) within the development has not been provided in the Plan and the road network in the area is already modelled to be well over-capacity when Blackwell Farm is developed.
– Policy ID3(3) on developments having regard to the Sustainable Movement Corridor will not be effective in its western section, because either the modal shift will not be pursued vigorously enough to make a significant difference (which appears to be the Local Plan’s preferred strategy), or, if applied with determination (such as by reducing private vehicle lanes in the A3 underpass from four lanes to two) could not be expected by itself to change driver behaviour significantly; in either case the result would be greater congestion on the local road network than it could take after the development of Blackwell Farm.

(3) The Plan is not justified, in the following respects:

– Policy S2 relies on the completion of the widening of the A3 in sufficient time for the proposed numbers of dwellings to be constructed before the end of the Plan period, but this cannot be a justified proposal because there is no certainty at all that the A3 widening will be completed by 2027, if ever; given the difficulty of finding alternative locations likely not to be dependent on capacity increases on the A3, the most appropriate strategy would be to abandon Policy A26.
– Policy A26 would cause the generation of so much traffic (both by itself and by the construction of the A3 without which Policy A26 cannot be implemented) that the local road network could not possibly cope with it, and documents supporting the Plan acknowledge that local roads would be put seriously over-capacity: such an arrangement cannot reasonably be the most appropriate strategy and the Plan is therefore not justified.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to A43 and A43A,

This planning is not needed, building additional slip roads to the A3 would be a horrendous destruction of Ripley village. The traffic is already difficult and you are encouraging more cars, more pollution and more traffic. This village would no longer be a village.

You can not build on the Greenbelt you even have policy's stating your protection of the Greenbelt and yet you think it is okay to suddenly put forward planning?

This site has PROTECTED woodland, antient woodland with tress for the 16th century.

Please give up on this plan and go and build on brown site areas, we do not need additional houses, our schools, doctors, roads are already too busy

Listen to the current residents of these villages and work along side them not against them please.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2268  Respondent: 15275041 / Cora Dennis  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy to protect Historic Enviroment?

But planning on chopping down and building on top of a ancient woodland with trees from the 16th century. Their are no exceptional circumstances for this plan

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2265  Respondent: 15275041 / Cora Dennis  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object!

I don't need to comment, you have said it yourself in the opening statement of this document. To prevent urban sprawl! Pot kettle black.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: SQLP16/508</th>
<th>Respondent: 15275041 / Cora Dennis</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I object to the local plan!

You have made significant changes to planning that has already been chopped and changed and argued and objected to before. The proses that I have been informed of regarding all these significant changes require you to arrange another FULL consultation (not sneeking it in at the end of a meeting) under regulation 18 it appears that you are trying to short cut the proses, most likely to not allow residents the time to object.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I object.

This site is not required, it is GREENBELT and you can not build on it.

An assessment carried out by the ELNA show that industrial space is not needed.
You have exaggerated (lied) regarding population growth these houses are not needed, not wanted. The effect upon traffic, schools, doctors, pollution would be disastrous and all to make a profit for greedy people, Ripley and Send are villages stop trying to take our villages away build on brown field sites

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/500  Respondent: 15275041 / Cora Dennis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I object to the local plan,

Duty to cooperate? This planning was snuck in at the last minute with no consolation to local residents. Your questionnaire is in jargon terms to me so you are purposefully making it difficult for residents to object.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1157  Respondent: 15275073 / Sean Lightfoote  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Site Allocation A43 - This is an entirely new development with no exceptional circumstances being built on Green Belt land. The site is protected under the NPPF and there is no excuse to build properties here. It is a conservation space with ancient woodlands. On top of the destruction of beautiful natural space you would be destroying the homes of some of our wildlife including rabbit warrens, bats roosts and badgers sets.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to Site Allocation A43a as you would effectively turn Send into a motorway linking the M25 to Woking. Send's infrastructure cannot take this level of through traffic past our local schools and surgery. It would create chaos and make the local road dangerously busy.</td>
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<td>I object to Site Allocation A44 as this is a new site that's not in the Regulation 18 draft. It's also not been included in previous consultations. This land is green belt, and a site that's unsafe to be build on. This was a former land fill site which is currently vented. As a public area it's beautiful countryside for properties it would be unsafe. It's serviced by a small road which would not be sufficient.</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
I object wholeheartedly to the continued destruction of green belt land. The entire idea of the greenbelt is to protect us from becoming a concrete jungle, protecting our wildlife and the natural environment within this country. There is absolutely no exceptional circumstance warranting this land being developed on. Leave it alone.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/501  Respondent: 15275073 / Sean Lightfoote  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I object on the basis that I don't believe the ELNA 2015 shows a need for an industrial area any more. I also believe that international student figures have been used to influence the amount of housing needed even though once their courses are complete they will spread out or return to their respective countries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/504  Respondent: 15275073 / Sean Lightfoote  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I object on the basis that the amount of properties Guildford Borough Council proposed was 185 and now gone to 485. Such a major difference requires a new consultation period under Regulation 18.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/505  Respondent: 15275073 / Sean Lightfoote  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I object on the basis that there are brownfield sites that should be being developed. There is no sound argument that the greenbelt land should be destroyed for additional housing when there are alternative locations that can be developed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/506  Respondent: 15275073 / Sean Lightfoote  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I object on the basis that the attempt to shortcut the process using Regulation 19 and holding the meeting virtually in secret is not a cooperative approach to the situation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1161  Respondent: 15275137 / Lewis Crane  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( Yes )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The scale of the A25 development is far too great and would require significant infrastructure improvements for it to be viable. I believe it would require it's own junction with the A3, doctors, rail station, dentist, primary and secondary school etc. It is likely to present significant impact to the residents of Burpham and Merrow due to it's close proximity to each of these communities. In addition, the development threatens the rural nature of this area.

A35 seems to make more sense as one of the larger housing schemes given that the site is formerly commercial and is derelict. I also feel that this area would benefit more from the investment in terms of new schools, commercial areas, etc.
and would not create such a congested and sprawling community so close to Guildford as would be created by developing A25.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

### Comment ID: PSLPS16/1162  Respondent: 15275169 / Eduardo Legname  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A23

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There is widespread anger within our community due to the intention to erect a burial ground (crematorium) in shocking proximity to our Stoughton/QEP area due to the following concerns

1) Health and environmental issues
2) Housing value
3) Traffic congestion.

The studies of the negative impact of crematoriums in local health is well documented. The area is permanently affected by traffic jams that will be worsened. Both conditions will lead to a negative drop in our life quality and properties values, among several other concerns.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

### Comment ID: PSLPS16/5877  Respondent: 15275169 / Eduardo Legname  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A23

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The local community is firmly opposed to the erection of a burial grounds of any kind within the proposed A23 estate. The fact that a crematorium of such scale will be as close to our houses has erupted negatively within our neighbours. This is due to several reasons:

1) Extreme proximity to the urban areas
2) Very congested road for such development
3) Environmental impact
4) Health impact
5) Cost impact
6) Existing housing value impact

In fact is hard to see where the benefits of such enterprise could bring to our community.

This kind of estate should be claimed within very isolated areas or at least with less obvious proximity to very dense populated areas.

The QEP association and other neighbours are going to dispute this specific plan projected up to the last consequences

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch is protected from development as Green Belt. There are no exceptional circumstances which allow for it’s removal from the Green Belt (Policy P2). Central Government state clearly that housing need is not an exceptional circumstance.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5886  Respondent: 15275201 / Jennifer Morritt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

North facing ramps to the A3 at Burnt Common would be a disaster for local communities, which do need to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic. E.g. all traffic from London/M25 to Woking would go through Burnt Common, Send and Old Woking. This is not sustainable as this cannot be improved and the roads are not able to withstand this level of traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11914  Respondent: 15275201 / Jennifer Morritt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

The Garlick’s Arch (A43) proposal would double the built area in the locality, and would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11911  Respondent: 15275201 / Jennifer Morritt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

There is too much traffic in our villages already and this plan will cause more congestion in Ripley, Send and Clandon, with no plan to improve that.

The rural roads in this area are narrow, in poor condition and have no footpaths. 5000 more houses means dangerous and unsustainable traffic. It is a well-known cycle route and an increase in road traffic will impact significantly on the safety of cyclists using this route which is already lacking adequate cycle pathways. A significant amount of through traffic is already funnelled through Ripley, Send and Clandon and this will add to congestion problems. Road traffic and congestion will increase with resultant damage to environmental quality.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11916  Respondent: 15275201 / Jennifer Morritt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the lack of proper infrastructure planning for sites (Policy I1)

The Plan does not identify adequate infrastructure improvements to support the huge scale of development, especially at Garlick’s Arch (A43) which has no infrastructure projects in the Infrastructure Schedule to support it. Local services, utilities and sewerage, doctors etc. are at or close to capacity.

There are no plans to improve the capability of the medical and police/emergency services to cover the 5000+ houses in the north east of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11917  Respondent: 15275201 / Jennifer Morritt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

The A3 or M25 would have to be improved before any development is done. Highways England has no plans to even start considering improving the A3 before 2020. Clearly no real improvements are possible in the time frame of this Plan so the developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), should not take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11915  Respondent: 15275201 / Jennifer Morritt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to poor air quality concerns (Policy I3)

The huge developments being proposed, particularly in the north east of the borough will lead to considerable further congestion and to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/11910  Respondent: 15275201 / Jennifer Morritt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11912  Respondent: 15275201 / Jennifer Morritt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to development in areas which are at risk of flooding (Policy P4)

The Plan does not take adequate account of flood risk as required by National Planning Policy.

The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11909  Respondent: 15275201 / Jennifer Morritt  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Local Plan as the development proposed is not sustainable (Policy S1)

13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, and as highlighted 86% of household in the borough already own at least one car with a significant proportion owning more than one, so almost every adult will have to have a car. The Plan has nothing to improve the infrastructure for Garlick's Arch.

The development should be in urban areas where there is sustainable transport

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11913  Respondent: 15275201 / Jennifer Morritt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Borough Wide Strategy (Policy S2)

GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

The Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing.

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages which compromises the overall character of the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/512  Respondent: 15275233 / Aidan Dennis  Agent:
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<td>The evidence is based on assumptions about population growth in the area which are wildly inflated beyond anything seen before and clearly not in line with the new reality which will be live outside the EU.</td>
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<td>We need to stop building on the green belt</td>
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<td>We need to stop building in sites where there is little or no road and rail infrastructure or where it is currently over loaded already: West Clandon, Ripley Ripley airfield, western end of Chilcott</td>
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<td>Should not be seeking to build on farm land when so much brown field sites are available where infrastructure already exists</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Attached documents:</td>
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<th>Comment ID: PSLPP16/11622  Respondent: 15275777 / Jason du Preez  Agent:</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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Having carefully considered the GUILDFORD NEW PLANNING DOCUMENTS I would like to STRONGLY OBJECT to the plans as set out.

My greatest concern is the erosion of Greenbelt policy. The very reason we choose to live and raise our families here is in major part due to the connection that the Surrey Hills has with the countryside, green spaces, controlled population density and outdoor leisure activities.

The value of this protection is enormous. We can attempt to attach tangible value to it, but the reality is that it even as we add up the value of all it offers we cannot calculate the intangible value of preserving these bands of green in an ever growing, every more populous and overcrowded land.

It is my STRONG OPINION that Greenbelt should be held sacrosanct. The point of providing this protection is to ensure it is absolute and for all time.

I am not objecting to reasonable planning or appropriate development in the Borough. However, taking villages like Horsley out of the Greenbelt fundamentally alters the character and protections that we hold dear in the places we’ve chosen to live. It seems far more logical to drive more careful thought in the planning and location of urban developments then creating less careful thought for developers who have NO VESTED INTEREST in the community to build on greenfield sites simply because its cheaper and more profitable. It is a complete outrage really.

I particularly protest at the “insetting” of 14 villages from the Green Belt, and at “infilling” 12 Green Belt villages. I STRONGLY OBJECT TO THE FACT THAT settlement boundaries are to be hugely extended in many villages and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are “leggy” in outline, reflecting the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and in and of itself invalidates the plan as a whole.

I believe this policy is based on a flawed Green Belt and Countryside Study that was irregularly commissioned by Council officers without the authority of Councillors. To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is just NOT TRUE given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF. IMPORTANTLY, this policy is disproportionate in terms of any foreseeable development requirement.

Our family, friends, community contacts and fellow residents are all in agreement that this needs to be OPPOSED AT ALL COSTS. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

The policy states that “the general extent of the Green Belt has been retained.” Simply put this is a serious misrepresentation of the facts. If it forms any basis for this policy change, the change is inherently flawed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I would like to raise strong objection to the proposed plan A22. Keens Park residents are outraged and very worried about the plan to include more houses in an area which already struggles with poor and deteriorated road infrastructure and lack of playground for local children. Aldershot Road and Worplesdon Road surrounding our community experience already very heavy traffic during rush hours. Northern part of the Worplesdon Road is very busy and narrow and dangerous for both cars and pedestrians. Keens Park area has very limited parking space, roads are very narrow and will not be able to cope with additional 140 homes. Also, in the current development there is no single playground. The only playground in this area is located in Queen Elisabeth Park, and in order to go there children need to cross dangerous round-about, or walk along very busy Worplesdon Road on a very narrow sidewalk. Finally, that playground even doesn't include basic equipment to play for under 3 year olds, apart from swings.

Should the houses be build, it is imperative to plan for:

- robust enhancement of local roads (Keens Lane, Worplesdon Rd)
- include significant recreation space for local residents including playground
Residents in northern Guildford (Stoughton/QEP/Keens Park) are outraged by the proposal to erect a burial area with a crematorium in the Salt Box Lane in a shocking proximity to our community. The studies of negative impact of crematoriums in local health is well documented in scientific literature. The area is full of young families and therefore we would like to raise a strong objection to the proposed plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1171  Respondent: 15276737 / Alessia Gualandris   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( Yes ), is Legally Compliant? ( Yes )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am very concerned about the proposal of a new burial ground (especially a crematorium) in area A23 on the north of Salt Box Road, very close to a largely populated area, especially the Queen Elizabeth Park.

It's very well known and scientifically documented that this would release a lot of mercury and toxins in the air, so a crematorium should never be built in/close to a residential area. If deemed necessary, a crematorium should be built in a remote location, far from houses and families.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
In addition, I do not agree with the 'objectively assessed need' of 693 new homes a year. For example, this does not consider student housing separately. In addition demographic and economic models supporting the figure should be freely available. Otherwise the process is not accountable. I also think the medium term economic growth assumptions should be reviewed post the Brexit vote as these are likely to be lower at least over the next 5-10 years. In addition it would be reasonable to expect inflows due to international migration to be lower. I do not believe there there is sufficient evidence to support the need for expansion that underlies the whole plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>It is also extremely important that expansion is kept sufficiently low that it protects the overall character of the town - I don't accept that the proposed plan does this.</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I think there should be a greater bias towards homes in the town centre and more student accommodation on campus, as opposed to substantially increasing the number of shops in the centre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17057  Respondent: 15277185 / David Skinner  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not think that the infrastructure development proposals are sufficiently robust to support the plan. To say that the development will not go ahead until infrastructure is in place is unenforceable and unaccountable. I just don't believe or trust this assertion. You only need to consider the unresolved issues such as another river crossing, a central and integrated bus facility. GRA's comments all apply here in my view absence of a clear and workable plan for an integrated bus interchange and incorporating plans for the demand and capacity of rail services are tow good examples. The plan also needs to provide more convincing data and assumptions on town centre traffic, buses and parking. The nature of Guildford's geography contained by the river and the railway means that the road system is particularly susceptible to congestion.

I fundamentally disagree with a plan that seeks to expand the size of the town by a quarter and therefore register my objection to it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17055  Respondent: 15277185 / David Skinner  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I oppose unjustified green belt development. I also think that allowing Green Belt development to pay for transport schemes is a flawed policy, given that it will be the development itself that gives rise to the need for more transport. I disagree with the methodology for parcelling and scoring potential green belt developments - using the number of functions as a scoring method is too narrow and doesn't allow for value judgement over the relative merits. In addition, I don't think the test of 'exceptional circumstances' for Green Belt development has been applied properly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Having read through much of the detail relating to this plan, I would like to object strongly to it. I fully support the Guildford Residents Association response. This plan is not ready for an inspector.

In particular, I am very concerned about the approach Guildford has taken compared to plans elsewhere in that it chooses not to constrain its overall housing growth. Why would we make this choice when others do choose to contain their growth plans?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attended documents:

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<th>Comment ID: SQLP16/526  Respondent: 15277217 / Corrie Wilkinson  Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

I do not support the increased development of the Green Belt, as it exists in and around Surrey, to this level in proposed in the Plan documents. Specifically but not only, I object to the following areas of development (generally and not specifically);

**Ockham / Wisley Airfield** - I object to the imposition of a new village development of this scale and the corroborating assumptions. This is based on a number of factors, including but not restricted to transport, amenity, retail, schooling, environmental, density, local roads, impact on current services and villages. The local roads are insufficient to cope with increased residential and delivery traffic - the assumption that the population will travel by bike hire scheme to use the local trains is laughable - the impact on demand for local services and clubs deleterious to current provision (current residents are on waiting lists - what happens when 4-5000 more people land...?) - this will be the start of the in-fill of the land between all the villages (Ockham, Horsleys, Effingham) with a loss of amenity, environment, local character and the increase in pollution, waste, traffic, nuisance, inconvenience, urbanisation and irretrievable loss of Green Belt...
Development in The Horsleys - I object to the significant number and increased provision of sites for medium / large scale housing projects in and around The Horsleys. There is insufficient capacity to absorb new developments in the area and it should not be acceptable for mass housing to be imposed in an area where public opinion is against it. The Horsleys are not a large metropolitan area, they do not have the services of a town or Cranleigh-size village and nor do they want them; by continuing to encourage concentration and development in and around these villages, the Council is agglomerating Effingham, The Horsleys, Bookham. Fetcham, Ockham into an homogenous residential area attached to Leatherhead, destroying the character of the Green Belt and passing the point of no return, by which time any control or restrictions on development are futile and the area becomes a suburban ribbon from London and Leatherhead / Guildford.

I am opposed to the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/528  Respondent: 15278177 / David Botley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

Assessment based on future needs and 'Brexit' not taken into account

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2329  Respondent: 15278209 / M Field  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the 2016 Draft a local Plan for the following reasons.

Who are these ridiculous people who make these decisions. Are they lacking in common sense.

Guildford town centre and the existing traffics routes are vastly over subscribed. These new measures would make it impossible to shop there.
The road structure through Burpham is a narrow rd of one lane in either direction.

The local hospital is also oversubscribed already without adding more capacity.

School and local GP services are inadequate already.

Development of this capacity in such a small area would bring unsatisfactory living standards to the area, as people live on top of one another, possibly generating a raised crime rate.

Sly fields depot is under pressure dealing with the refuse generated now. How much more refuse will be generated by all these extra dwelling.

Where will the people living in these homes find employment. The area isn't suitable for industry and further business buildings who will be able to afford to rent them.

Industry being at an all time low in this country anyway.

We already have a railway site at merrow pk which has been closed for years when opening it would benefit the existing population when merrow pk est Weylea farm and bowyer farms estates were built. It was t feasible because of the lack of infrastructure To deal with it then. So why add to it know.

The existing park and ride is undersubscribed already so why add another site.

With existing population increased by the university why would we need 2000 thousand homes with it inmates swelling it even further.

Finally we would have to take turns to shop in Guildford and use the roads on rota basis. How much unused business capacity is there already in Guildford.

The sports centre is also oversubscribed where would all the extra children go.

How many children would this exercise add to the area existing and to be born.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
We therefore strongly support and endorse the objections raised by East Horsley Parish Council to these Policies.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2331  Respondent: 15278337 / Alastair Rutherford-Warren  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Homes for All, Policy H1 and H2

We agree with the objections of the East Horsley Parish Council to “one size fits all” policy of the Guildford Borough Council as it affects East Horsley, and we therefore object to Policy H2

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2333  Respondent: 15278337 / Alastair Rutherford-Warren  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Infrastructure, Policies I1, I2 and I3

As residents of the village of East Horsley, we are all only too aware of the deficiencies and dangers summarised by East Horsley Parish Council in its specific comments on these Policies. Whilst most would, very reluctantly, accept the status quo, a deteriorating picture would meet with very strong objections and opposition. Given the housing plans, a significant deterioration is would be inevitable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2332  Respondent: 15278337 / Alastair Rutherford-Warren  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Green Belt, Policy P2

The jargon in paragraphs 4.3.11 to 4.3.17 is impenetrable to the lay reader, but in so far as the draft Plan proposes that East Horsley and Wisley Airfield should cease to be within the Green Belt and that the settlement boundaries of the village should be moved, we strongly object and support the position of the East Horsley Parish Council in its opposition.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/2330    **Respondent:** 15278337 / Alastair Rutherford-Warren    **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Guildford Borough Council –Draft Local Plan

We represent the views of 54 individual residents in The Ridings, East Horsley, KT24 5BN, a private road off Forest Road, who are unanimous in their objection to the proposed submission of the Local Plan, on the following grounds.

**Borough-Wide Strategy, Policy S2**

We do not have the expertise to analyse the figures in this part of the Plan, but we have read and understood the comments made by East Horsley Parish Council, and we strongly support its comments. In view of the doubts it casts on the veracity and reliability of your figures, the burden of proof in justifying the very significant building proposals is now plainly on the Borough Council.

We specifically reject the Borough’s Forced Growth Policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPA16/4303    **Respondent:** 15278369 / Ripley Parish Council (Jim Morris)    **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

13. The specific policies about which RPC are concerned are addressed in turn below.
   Housing Need Calculation

14. RPC object to the approach taken to the assessment and calculation of the housing requirement in the plan.

15. The PSLP seeks to meet OAN by delivering 693 pa during the plan period, an overall figure of 13,860 in the plan period with delivery of housing numbers increasing from 500 per annum in 2018-19 to 790 p.a. in 2032/331.

16. The justification for this is explained in the Sustainability Appraisal June 2016 at para 6.2.10:

   “Guildford Borough Council is committed to delivering its OAN figure, having established that there is no potential to justifiably ‘under-deliver’ and rely on neighbouring authorities to meet the shortfall (under the Duty to Cooperate). Whilst Guildford Borough is heavily constrained environmentally, it does not stand-out as relatively constrained in the sub-regional context. This conclusion is reached on the basis of Duty to Cooperate discussions, past SA work (notably spatial strategy alternatives appraisal in 2013/14 – see discussion above), an understanding of precedents being set elsewhere, and other sources of evidence. It is evidently the case that under-supplying in Guildford would lead to a range of socio-economic problems, given that Woking is already under-supplying within the HMA.21 There is an argument for under-supplying to be preferable from an environmental perspective; however, this argument is far from clear cut given an assumption that unmet needs would have to be met elsewhere within the HMA (i.e. within Waverley, which is heavily constrained) or elsewhere within the heavily constrained sub-region. For these outline reasons options that would involve planning for a level of growth significantly below that necessary to meet OAN are considered unreasonable at the current time.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4304  Respondent: 15278369 / Ripley Parish Council (Jim Morris)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
This site which has long been included in the Green Belt has been excluded in the PSLP.

RPC accepts the principle of insetting this site as to do so would be consistent with paragraph 85 of the NPPF.

However, RPC objects to the inclusion of The Spinney in the area to be inset and submits that the Plan should be modified to as to exclude this area which is adjacent to HMP Send. No exceptional circumstances or change of circumstances have arisen which would justify the insetting of this part of the site, so as to remove its Green Belt protection. RPC consider that the open and undeveloped character of this area distinguishes it from the Prison site and justifies its retention in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Answer (if comment is on questions 1-7 of the questionnaire): ()


The Report identifies and comments on the policies in the PSLP, in particular those affecting the Parish of Ripley and its community and sets out the RPC’s reasoned objections to the PSLP.

In particular the Parish Council objects to the following proposed allocations and policies in the Plan:

- Site allocation Policy A43 Land at Garlick’s Arch
- Site Allocation Policy A43a Land for new north facing slip roads to/from A3 at Send Marsh/Burnt Common
- Site Allocation Policy A45: Land at rear of the Talbot, Ripley
- Site Allocation Policy A57: The Paddocks, Rose Lane Ripley
- The following Site Allocation Policies:

A25 Gosden Hill Farm
A35 Land at former Wisley Airfield, Ockham
A36 Hotel Guildford Road East Horsley
A37 Land at Bell and Colvill, West Horsley
A38 Land at West Horsley
A39 Land near Horsley Station, West Horsley
A40 Land to the north of West Horsley
A41 Land to the south of West Horsley

- Green Belt insetting; in particular:
  (a) Insetting of Ripley Village
  (b) Insetting of HMP Send
  (c) General insetting of Green Belt settlements
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7970  Respondent: 15278369 / Ripley Parish Council (Jim Morris)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

'Report on Guildford'

<documents attached>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?


Comment ID: PSLPS16/7976  Respondent: 15278369 / Ripley Parish Council (Jim Morris)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

116. RPC has had the opportunity to see the Report of Richard Harwood Q.C. prepared for Wisley Action Group. RPC wishes to adopt the views expressed in the Report and accordingly agrees that the allocation is unsound. This report is attached, for reference.

117. Accordingly, RPC objects to the allocation of Land at Wisley Airfield and recommends that the Plan should be modified and the allocation for housing should be deleted in its entirety.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7971  Respondent: 15278369 / Ripley Parish Council (Jim Morris)  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

RPC objects to the insetting of Send and Burnt Common in general, but particularly objects to the extension of the settlement to exclude the Garlick’s Arch site from the Green Belt and to allocate the land for built development. In the case of Site A43 and Site A43a, Send Marsh/Burnt Common, the insetting of the Garlick’s Arch allocation appears to have no other justification than the very late substitution of the Garlick’s Arch site at the Executive Meeting on 24th May 2016 itself.

The site continues to serve a number of the Green Belt purposes and is an important green buffer to the A3 and of ecological and landscape importance.

There is nothing stated in the reasoned justification in the Plan to indicate that any exceptional circumstances exist to justify the allocation and the insetting of the Green Belt boundary.

It does not appear to have been identified by the process of criteria-based assessment of site through which other sites were identified for allocation and there is no explanation for the substitution of the original A43 allocation “land around Burnt Common Warehouse” which was much more appropriate, given its largely previously developed character.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7972  Respondent: 15278369 / Ripley Parish Council (Jim Morris)  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A43 “Garlick’s Arch”
62. This site is currently open rural greenfield land within the Green Belt. It has been allocated, at the last moment, for 400 homes and up to 7000 sq m of either B1(c) light industrial or a mix of B1(c), B2 Industrial and/or B8 storage and distribution. The emergence of this site only in the Regulation 19 draft of the PSLP means that the principle of the allocation of site has not been subject to the earlier consultations and this is the only opportunity to influence the Plan before its submission to the Secretary of State. This is particularly regrettable and prejudicial given that the proposal of this site as a site for 400 new dwellings, and the provision of slip roads to A3 via policy A43A only emerged through the decision of the Council’s Executive on 11 May 2016. This meeting was held without proper notice or any opportunity for consultation to make an unexplained substitution for the site given the same policy number, on previously developed land west known as Land around Burnt Common warehouse, London Road, Send, allocated for approximately 100 homes and 7000 sq m of B class industrial uses.

63. The ministerial foreword to the NPPF by minister Greg Clark states: “because planning policy itself has become so
elaborate and forbidding – the preserve of specialists, rather than people in communities. This National Planning Policy Framework changes that. By replacing over a thousand pages of national policy with around fifty, written simply and clearly, we are allowing people and communities back into planning.” [emphasis added]

64. The NPPF makes it clear that:
“69 The planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Local planning authorities should create a shared vision with communities of the residential environment and facilities they wish to see. To support this, local planning authorities should aim to involve all sections of the community in the development of Local Plans and in planning decisions, and should facilitate neighbourhood planning.”

65. Those words sound more than a little hollow in the context of this decision, which has not gone through the exhaustive process of sieving and consulting on site allocation proposals. It is plain that the late introduction of this important and damaging proposal took place in direct breach of the approach in NPPF which seeks to involve and consult communities about proposals that affect them.

66. The site was identified in the Pegasus Report Vol 5 in 2013 as site B14, together with site B13 as part of a possible – “major village expansion” . This was rejected and not taken forward in the 2014 draft Local Plan, although the previously developed site “Land around Burnt Common warehouse “…. B13 was originally allocated as A43. RPC did not object to that allocation.

67. However, the deletion of the original A43 site and its substitution with the Garlick’s Arch site is unacceptable for a number of reasons.
68. The site was assessed in the Guildford Borough Land Availability Assessment (LAA) February 2016, but as far as the RPC has been able to establish, this is the only recent assessment of the site.

69. The assessment in the LAA is woefully inadequate. The site is in an unsustainable location, poorly served by public transport, with little or no access to services and community facilities and with a noise environment dominated by traffic noise from the A3. The site does not appear to have been considered as part of the SEA/ Sustainability Assessment and it is not clear why the additional 300 dwellings are required in this location.

70. There has been no assessment of ecological impacts either in terms of species or habitats. Yet the site is well known for the presence of red kites, sparrowhawks. Bats (several species), Owls (several species) badgers, deer, foxes, and many species of invertebrates.

71. It is not clear whether, given its late inclusion, statutory consultees such as Natural England were consulted over its inclusion. The public were not consulted.

72. A site of this scale and nature should have been proposed through the local plan process so as to ensure proper consultation. It was not considered in any earlier draft of the Local Plan. Its sudden inclusion remains a complete mystery to RPC.

73. The site is largely open rural countryside of both landscape and ecological importance providing a green buffer between the heavily trafficked A3 and the settlement of Burnt Common.

74. The site fully satisfies retention within the Green Belt and serves a number of Green Belt functions and makes an important contribution to local openness.
75. The site is fundamentally unsuitable for housing development and the compromised nature of the site, by constraints such as the presence of high volumes of traffic in close proximity and the large high voltage pylons which cross the site longitudinally, as well as areas of ancient woodland mean that development would either result in substantial harm to the ancient woodland, species and habitat, lead to unacceptable living conditions or would not make best use of land. There is no masterplan to show how the scale of development envisaged would be accommodated.

76. Previous development, with much more limited housing development (up to 25 units) (Planning Reference 14/P/00219 February 2014) on this site has been refused because of the adverse effect on the Green Belt and the rural character of the site. If 25 dwelling units comprised harm to the rural and open character of the site, 400 units must be the cause of very much more substantial harm. In addition, Planning Ref 16/P/00783 Oldlands Field Yard (Outline) 9 dwelling houses April 2016 was also refused on 07/06/2016 because of the impact on the openness of the Green Belt, the significant effect on the Thames Basin Heaths Special Protection Area (TBHSPA) and the loss of rural economy.

Non sustainable location

77. The site does not represent sustainable development for several reasons.

78. Firstly the site does not provide a sustainable location, both in respect of access to transport, services and other facilities.

79. Poor access to public transport would mean high dependency on the private motor car for residents’ access to schools, shops, medical facilities, doctors’ surgeries, and all the requirements of day to day living. The size of the site at 400 units would not be capable of sustaining facilities on-site and there are no cycle routes or segregated cycling or walking areas. Clandon Station is 2 miles distance with limited parking, no cycle path and a footpath that changes sides repeatedly. The only bus service is an infrequent rural bus service. No sustainable transport assessment has informed the allocation.

80. The industrial use of the site would also be likely to generate additional traffic and use by car for those employed at the site. There is no evidence of demand for 7000 sq m of new B class uses on such a site.

81. Secondly, in terms of harm to the environment the development of the site would be likely to cause a number of substantial impacts, including harm to ecology, landscape and damage to, or loss of ancient woodland.

82. The late introduction of this allocation means that it has not formed a part of the 2016 Sustainability Assessment and no separate environmental impact assessment has been carried out in respect of the development of the site.

83. The impacts of ecology of the development of 400 units on the site have simply not been assessed and are unknown.

84. No ecological study or assessment appears to have been made.

85. Significant parts of the site are Ancient Woodland and protected by Tree Preservation Orders. Ancient woodland and veteran trees are widely recognised for their importance to biodiversity and as host for protected species.

86. The site is within 400m of the Thames Basin Heath SPA.
87. There is local knowledge of several species of owls, several species of bats, badgers, deer, foxes, red kites, sparrow hawks, invertebrates resorting to the site. It is considered likely that protected mammals, bats and birds are breeding within
the site.
Poor living conditions

88. Thirdly, the site is likely to suffer from poor living conditions; in particular noise and air quality impacts from proximity to the A3 and the creation of the new junction with the A3 trunk road under allocation A43a. It is understood that a study is being carried out for the neighbourhood plan, but that exercise has not been completed and did not inform the allocation.

Pylons

89. The site is traversed by large high voltage electricity pylons, which will require a safeguarded zone beneath them where residential development cannot take place. In addition there is mention of the possibility of re-siting these pylons however it remains unclear about the cost implications or who will be funding this.

Flood risk

90. The assessment of flood risk is flawed. Large parts of the central part of the site are high risk (Zones 2&3) and flood annually. The haste with which the site has been allocated means no proper flood risk assessment has been made. Neither the extent, frequency and potential for mitigation or its effect on the developable area have not been considered. Such an assessment should be made before, not after, allocation.

Loss of agricultural land

91. The land is assessed as Grade 2 agricultural land. The agricultural use of the land will be lost if the site is developed for 400 units and 7000sq m of industrial. Loss of the best or most versatile land to development should be avoided.

Deliverability

92. Deliverability is essential to soundness. Astonishingly, no assessment has been made of the potential of the site to deliver the 400 units having regard to the proximity of the A3 and the weight and volume of traffic. The LAA is silent on this matter, not even making a note of the issue.

93. There is no assessment of the viability of development on this site or its deliverability given the range of significant constraints.

94. There is no explanation as to why a potentially suitable site (i.e Land Around Burnt Common Warehouse( B13, the previous 2014 Plan’s A43) was dropped and replaced by this fundamentally unsuitable site for the development of substantial new housing.

Conclusions

95. The allocation of Garlick’s Arch is fundamentally unacceptable in a number of respects and would not constitute sustainable development, contrary to the NPPF. The allocation has not been informed by evidence of its environmental impacts or its suitability for development and this aspect of the SPLP is plainly not sound. RPC objects to this allocation and recommends a modification to the Plan in that the allocation should be deleted in its entirety.
Policy A43a Land for new north facing slip roads to/from A3 at Send Marsh/Burnt Common

Areas of land on both sides of the A3 are identified for future highway work in providing slip roads for the A3. The provision of land for slip roads to the A3 in allocation A43a is largely to provide enhanced highway access so as to serve inappropriate large scale housing development elsewhere in the Send/Ripley area; in particular, the sites at A25 Gosden Hill Farm and Site A35 at former Wisley Airfield currently served by the inadequate rural network and including 400 units proposed on the Garlicks Arch site.

96. The slip roads A43a are not in any Highways Programme and their delivery is very uncertain. Highways England have no provision to look at the A3 in any area until at least 2020/2022 and therefore it is unknown whether these slipways will ever be developed. Infrastructure should be in place before development commences.

97. There does not appear to have been any report to the Executive Committee to support this allocation and the LAA 2016 is hopelessly inadequate as an assessment of the environmental impact on the site or as an assessment of its suitability for the development proposed. RPC are concerned that it appears that Members were compelled to make the decision to allocate the site with very little information and without any proper assessment of the constraints of the site or any evidence of its deliverability.

Conclusions

98. RPC objects to this allocation and recommends that the Plan should be modified so that the site should be excluded from the allocations and from development and its current Green Belt status should be retained.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7973  Respondent: 15278369 / Ripley Parish Council (Jim Morris)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

99. This site is allocated for 18 Homes (C3) and 200 m of retail or service uses (A1-A5).

100. The site is within the Ripley Conservation Area, adjoins listed buildings including the Grade 2* Talbot Inn which falls within the top 6% of listed buildings.

101. There does not appear to have been any assessment of the impact of the proposed development on the significance of designated heritage assets, including the effect on the setting of the listed buildings adjoining and the effect on the character and appearance of the conservation area and its setting. The duties under section 66 and 72 of the Listed Buildings Act 1990 need to be considered at this stage as the plan making process is part of the planning functions which engage such duties.
102. The proposals also involve redrawing the Green Belt boundary to exclude the site and to include it within the Ripley village inset area.

103. There is nothing to suggest that the decision to allocate the land and exclude it from the GB was based on any assessment of its Green Belt functions. The rear of the site is still entirely open, being down to paddock and it plainly still serves most of the GB purposes, including the protection of historic settlements villages. The type of development which would occur with access from part of the core of the historic centre of the village would be to create modern cul-de-sac development which is wholly inconsistent with the historic character of the location. The frontage of the site (currently a car sales yards and showroom) and possibly part of the area to the rear which is previously developed land could be redeveloped for a much smaller housing scheme, but without the need to take the open greenfield land to the south.

104. The loss of the small industrial units to the rear should be reconsidered. Such facilities are increasingly rare and valuable within rural settlements and are often lost to more lucrative housing development.

105. There are no exceptional circumstances for to justify the redrawing of the Green Belt as proposed and the development would be inconsistent with the NPPF.

Conclusions

106. RPC objects to the allocation as currently proposed and recommends that the PSLP should be modified to exclude from allocation the open land to the south and east of the site that are included in the allocation and the Green Belt status of the land should be retained.

107. RPC further recommends that the light industrial uses in the Barn buildings to the rear of the site should be recognised in the plan and to be protected from redevelopment, not least by removal from the allocation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

108. This site is currently occupied for a traveller caravan site.

109. It is proposed that it should be allocated for 4 traveller pitches. This would be a material intensification of the use. The site is open countryside within the Green Belt and the development would be inappropriate development in this location. The creation of further traveller pitches (almost certainly leading to 8 caravans on the site, four of which would probably be
static mobile homes) would seriously affect the rural character of this area and in a way that could not be mitigated successfully in this open location. The site is principally seen from or across the Playing Field.

110. The PSLP should be modified to delete this allocation entirely. Planning permission for the use of the land as a caravan site for 2 static caravans and 3 touring caravans was refused in February 2010. An Enforcement Notice (EN), requiring the cessation of the use of the land as a caravan site, was issued in March 2010. Appeals against the refusal of planning permission and the EN were dismissed in September 2010 following a Hearing with the period for compliance with the EN increased to 12 months. A High Court challenge to the refusal of planning permission was dismissed by Mr Justice Hickinbottom on 10 April 2013. Following this, the EN came into effect. This included a requirement to clear the site by 10 June 2014. This has not been complied with and the EN remains extant.

111. A temporary three year permission was issued following an appeal under section 78 of the Town and Country Planning Act against the refusal of planning permission in April 2015. The Inspector found that the existing development (a single family use) is out of keeping with its surroundings and detracts from the character of the area, detracts from the setting of the Conservation Area which is a heritage asset, reduces the openness of the surrounding countryside and degrades the rural character of the land that provides a buffer around the Conservation Area which maintains its rural setting.

112. The temporary permission was granted having regard to the personal circumstances of the occupiers of the site and their children but, in particular the Council’s case that it would find alternative sites elsewhere within the three year period of a temporary consent.

113. Instead, despite having contested the current use in two planning appeals and a High Court challenge and contrary to their submissions at the EN and section 78 appeals, the Council now appear to be intending to make the site permanent and to expand it from a single temporary pitch to four permanent pitches; a complete volte face.

114. The scale of damage to Green Belt, landscape character and heritage assets caused by single pitch would be unacceptably exacerbated by increasing intensity of use caused by 4 permanent pitches.

Conclusions

115. RPC objects to this allocation in principle on the basis that it is not sustainable development; its environmental, landscape and heritage impacts are unacceptable, as has been found in two previous planning appeals. It is therefore recommended that the Plan should be modified by the allocation being deleted in its entirety.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<table>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Loss Of Rural Economy

59. RPC considers that Oldlands Field Yard which forms part of the Garlick’s Arch site (A43) and also the barns behind the Talbot (A45) are all excellent examples of successful rural economy sites. There are many very well established and successful businesses housed at these two locations which will be lost.

60. RPC is concerned at the absence of policy protection in the Plan for existing well established local light industry and employment uses to higher value residential development. This is particularly significant in rural areas, where the relationship between small scale industry operated by local people is a long term process which, once lost may take very long periods to recover. Many such industries and employment uses are often forced to re-locate to the urban area where they may not be viable. The local connection, once lost is often irreplaceable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17644  Respondent: 15278369 / Ripley Parish Council (Jim Morris)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

34. RPC is very well aware of (and supports) the need to provide new affordable housing to serve existing and growing rural communities but the creation of isolated new or extended settlements of principally market housing as the basis for generating supply of affordable housing is misconceived and it is noted that, in any case, it does not remotely amount to sufficient affordable housing to meet local need. Guildford Borough has some of the highest costs of housing in the country, so that 80% of market value still remains unaffordable to many workers in the area.

35. Affordable housing in rural areas should be provided in or close to the settlements that it is going to serve, rather than as ad hoc adjuncts to larger new market housing developments. Such new development has historically been absorbed largely in or on the edge of rural settlements. Extensive and substantial new market housing areas in unsustainable locations causes irreversible harm to rural character, congestion and danger on rural road network and damage to social cohesion.

36. RPC considers that new housing, both market and affordable should be achieved close to and within major urban areas, principally in Guildford itself where high density housing can be provided on previously developed land close to services, shops and employment. Such an approach would be consistent with the principles of sustainable development in the NPPF. The current distribution strategy proposals are directly contrary to the principles of sustainable development in the NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17643  Respondent: 15278369 / Ripley Parish Council (Jim Morris)  Agent:
Infrastructure problems are not limited to highways. New homes need schools, health, and other services which are not available in the local area. If these facilities are provided in the rural area, the intensification of activity will contribute to urbanisation of the rural area.

33. The full consequences of this approach is likely to include:

- Erosion of the Green Belt, harm to the landscape and historic character of some of the most attractive historic villages
- Large numbers of houses in places poorly serviced by public transport and local services, employment and retail facilities; resulting in
- Substantial increases in car borne commuting; resulting in
- Increased pressure on the existing unsuitable highway network, particularly the smaller unsuitable rural roads which will serve new or expanded settlements in the countryside north of Guildford, including Ripley, Send and Clandon, Ockham and East/West Horsleys
- Inappropriate highway works to increase junction capacities or to provide improved visibility splays; resulting in
- Loss of rural character and
- The creation of larger isolated communities with few services and harm to community cohesion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17642  Respondent: 15278369 / Ripley Parish Council (Jim Morris)  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Traffic and Transport

29. There is no realistic proposal in the Plan for the provision of enhanced public transport, which could lead to significant modal shift. By the nature of the rural road network, the resulting substantial increase in road traffic would be likely to cause either (a) increased traffic on inappropriate rural roads; and/or (b) pressure to expand highway capacity with resulting urbanisation of the rural area.

30. The impact of these large scale principally housing developments (A43 Garlick’s Arch, A25 Gosden Hill, A35 Land at Wisley Airfield and A36-A41 Horsleys) on the roads around Ripley are likely to lead to unacceptable levels of traffic that cannot be mitigated due to the nature of the country lanes around Ripley and the listed buildings within the conservation area of Ripley.
31. They are also likely to add significantly to traffic on the already congested A3. Highways England have stated that the A3 north of Guildford to M25 is already at capacity in both directions in the peak hour. This problem will be exacerbated by the substantial new housing proposed for the rural area north of Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPP16/17641  Respondent: 15278369 / Ripley Parish Council (Jim Morris)  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A disproportionate part of the new housing provision is to be allocated to settlements and adjoining areas in the Green Belt, particularly in the Send/Lovelace Wards of the District.

27. RPC object to other Allocation Policies including:
A25 Gosden Hill Farm
A35 Land at former Wisley Airfield, Ockham
A36 Hotel Guildford Road East Horsley
A37 Land at Bell and Colvill, West Horsley
A38 Land at West Horsley
A39 Land near Horsley Station, West Horsley
A40 Land to the north of West Horsley
A41 Land to the south of West Horsley

28. These proposals together amount to a total of 4533 homes (approximately 35% of the total new housing provision for the whole Borough) within a 3 mile radius of Ripley. As such they are likely to indirectly and directly affect Ripley with the likelihood of traffic and infrastructure problems.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPP16/17645  Respondent: 15278369 / Ripley Parish Council (Jim Morris)  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The approach adopted by the GBC in the Local plan is to exclude land in and surrounding rural settlements from the protection of Green Belt designation by “insetting” of land some of which continues to serve the Green Belt purposes and contributes to the openness of the Green Belt.

40. The approach appears to have taken place as a significant general shift in policy, rather than on the basis of an assessment, in each case, of the extent to which the land in question still serves GB functions.

41. The “exceptional circumstances” required to justify amendment of GB boundaries are not identified.

42. The exclusion of these areas is not in accordance with the guidance in the NPPF. Unless this policy is modified the Plan cannot be “sound” and the criteria in Section 20 of the 2004 Act are not met.

43. RPC objects to the proposed insetting of rural villages so as to exclude them from the Green Belt protection.

44. There are no exceptional circumstances which justify such an approach and it does not follow or accord with the guidance in the NPPF set out above.

45. This Report is particularly concerned at the following insetting: (1) the insetting of Ripley Village; (2) the Send Marsh/ Burnt Common insetting.

46. There is no change of circumstances or exceptional circumstances which justify the insetting.

47. While RPC objects to the general approach to insetting in principle, it also objects to alignment of the boundary of the insetting, which has been drawn too widely and without proper or any regard to the character of the land to be excluded from the Green Belt or the extent to which it continues to fulfil Green Belt purposes.

48. RPC objects in particular to the insetting of land to the rear of the Talbot and the allocation A45. (above) The land to the rear of the built development behind the Talbot beyond the light industrial buildings is open land and forms a valued part of the rural setting of the village.

49. RPC takes the view that the insetting of Ripley Village has been far too widely drawn. The NPPF para 86 states: “If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt.”

50. Whilst acknowledging that much of the Village of Ripley is in a widely drawn conservation area RPC consider that the open character of the village does make an important contribution to the openness of the Green Belt which justifies retention of its existing Green Belt status.

51. Accordingly RPC objects to the insetting of Ripley from the Green Belt, both in principle and in detail. The Plan is not “sound” in this respect and RPC recommends that the Plan should be modified to retain the village entirely in the Green Belt. If this objection is rejected, and the village is to be inset, the boundary should be drawn more tightly into the existing village built envelope and the paddock are to the rear of The Talbot excluded. Send Marsh and Burnt Common (See page 361 of the PSLP).
52. RPC objects to the insetting of Send and Burnt Common in general, but particularly objects to the extension of the settlement to exclude the Garlick’s Arch site from the Green Belt and to allocate the land for built development. In the case of Site A43 and Site A43a, Send Marsh/Burnt Common, the insetting of the Garlick’s Arch allocation appears to have no other justification than the very late substitution of the Garlick’s Arch site at the Executive Meeting on 24th May 2016 itself.

53. The site continues to serve a number of the Green Belt purposes and is an important green buffer to the A3 and of ecological and landscape importance.

54. There is nothing stated in the reasoned justification in the Plan to indicate that any exceptional circumstances exist to justify the allocation and the insetting of the Green Belt boundary.

55. It does not appear to have been identified by the process of criteria-based assessment of site through which other sites were identified for allocation and there is no explanation for the substitution of the original A43 allocation “land around Burnt Common Warehouse” which was much more appropriate, given its largely previously developed character.

56. This site which has long been included in the Green Belt has been excluded in the PSLP.

57. RPC accepts the principle of insetting this site as to do so would be consistent with paragraph 85 of the NPPF.

58. However, RPC objects to the inclusion of The Spinney in the area to be inset and submits that the Plan should be modified to as to exclude this area which is adjacent to HMP Send. No exceptional circumstances or change of circumstances have arisen which would justify the insetting of this part of the site, so as to remove its Green Belt protection. RPC consider that the open and undeveloped character of this area distinguishes it from the Prison site and justifies its retention in the Green Belt.

Loss Of Rural Economy

59. RPC considers that Oldlands Field Yard which forms part of the Garlick’s Arch site (A43) and also the barns behind the Talbot (A45) are all excellent examples of successful rural economy sites. There are many very well established and successful businesses housed at these two locations which will be lost.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Distribution of Housing
26. A disproportionate part of the new housing provision is to be allocated to settlements and adjoining areas in the Green Belt, particularly in the Send/Lovelace Wards of the District.

27. RPC object to other Allocation Policies including:
   A25 Gosden Hill Farm
   A35 Land at former Wisley Airfield, Ockham
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28. These proposals together amount to a total of 4533 homes (approximately 35% of the total new housing provision for the whole Borough) within a 3 mile radius of Ripley. As such they are likely to indirectly and directly affect Ripley with the likelihood of traffic and infrastructure problems.

Traffic and Transport
29. There is no realistic proposal in the Plan for the provision of enhanced public transport, which could lead to significant modal shift. By the nature of the rural road network, the resulting substantial increase in road traffic would be likely to cause either (a) increased traffic on inappropriate rural roads; and/or (b) pressure to expand highway capacity with resulting urbanisation of the rural area.

30. The impact of these large scale principally housing developments (A43 Garlick’s Arch, A25 Gosden Hill, A35 Land at Wisley Airfield and A36-A41 Horsleys) on the roads around Ripley are likely to lead to unacceptable levels of traffic that cannot be mitigated due to the nature of the country lanes around Ripley and the listed buildings within the conservation area of Ripley.

31. They are also likely to add significantly to traffic on the already congested A3. Highways England have stated that the A3 north of Guildford to M25 is already at capacity in both directions in the peak hour. This problem will be exacerbated by the substantial new housing proposed for the rural area north of Guildford.

Infrastructure
32. Infrastructure problems are not limited to highways. New homes need schools, health, and other services which are not available in the local area. If these facilities are provided in the rural area, the intensification of activity will contribute to urbanisation of the rural area.

33. The full consequences of this approach is likely to include:
   Erosion of the Green Belt, harm to the landscape and historic character of some of the most attractive historic villages
   ? Large numbers of houses in places poorly serviced by public transport and local services, employment and retail facilities; resulting in
   ? Substantial increases in car borne commuting; resulting in
   ? Increased pressure on the existing unsuitable highway network, particularly the smaller unsuitable rural roads which will serve new or expanded settlements in the countryside north of Guildford, including Ripley, Send and Clandon, Ockham and East/West Horsleys
Inappropriate highway works to increase junction capacities or to provide improved visibility splays; resulting in loss of rural character and the creation of larger isolated communities with few services and harm to community cohesion.

34. RPC is very well aware of (and supports) the need to provide new affordable housing to serve existing and growing rural communities but the creation of isolated new or extended settlements of principally market housing as the basis for generating supply of affordable housing is misconceived and it is noted that, in any case, it does not remotely amount to sufficient affordable housing to meet local need. Guildford Borough has some of the highest costs of housing in the country, so that 80% of market value still remains unaffordable to many workers in the area.

35. Affordable housing in rural areas should be provided in or close to the settlements that it is going to serve, rather than as ad hoc adjuncts to larger new market housing developments. Such new development has historically been absorbed largely in or on the edge of rural settlements. Extensive and substantial new market housing areas in unsustainable locations causes irreversible harm to rural character, congestion and danger on rural road network and damage to social cohesion.

36. RPC considers that new housing, both market and affordable should be achieved close to and within major urban areas, principally in Guildford itself where high density housing can be provided on previously developed land close to services, shops and employment. Such an approach would be consistent with the principles of sustainable development in the NPPF. The current distribution strategy proposals are directly contrary to the principles of sustainable development in the NPPF.

Conclusions

37. Accordingly, RPC objects to the scale and distribution of housing proposed in Table 1 of the Plan “Proposed Delivery between 2018 and 2033”. The proposed delivery plan does not constitute sustainable development, would result in loss of rural character, harm to heritage assets, urbanisation, increased traffic and intensification of use and social isolation and harm to community cohesion.

38. RPC considers that the proposed Planned Delivery is so misconceived and so fundamental to the Plan that it is hard to see how it could be modified without large tracts of the Plan being re-written. Without substantial modification and rewriting, the Plan is not sound within the meaning of section 20 and paragraph 181 of the NPPF. RPC recommends that the Plan should be withdrawn or at least substantially modified by reducing significantly and re-distributing new housing currently proposed for the rural area in Table 1 Planned Delivery and by making consequent main modifications to the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17640   Respondent: 15278369 / Ripley Parish Council (Jim Morris)   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The Parish Council also objects to the overall strategy for new housing development, which:
(a) is based on an OAN with no allowance for the policy and landscape constraints of the District;
(b) appears to exceed the OAN for the District;
(c) would cause significant harm; not only from the development of countryside for housing but also by reason of its effect on minor rural highway network; and
(d) disproportionately directs new housing to villages and land in the Green Belt and rural areas.
This Report sets out the objections to that Strategy.

While Guildford Town Centre and urban area takes 2,742 units. This is less than 14% of the total projected housing requirement and much of the remaining 11,000 homes are to be accommodated in urban and village extensions (mainly open countryside around existing settlements) and in rural areas including what are called “inset villages” - effectively a redrawing of Green Belt boundaries to exclude former Green Belt villages and open land surrounding them from the protection of Green Belt designation. Of the 11,000 non-Town Centre requirement over 50% are being planned for the 3 North East Wards of Lovelace, Send and Clandons/Horsleys. This is disproportionate and unacceptable for such a small and sparsely populated area.

It is noted that there is a significant shift in the balance of urban to rural housing site allocation at the expense of the Green Belt, when comparing the housing allocations in 2016 in comparison to the 2014 draft Plan. In the 2014 Plan Guildford town centre and urban area was allocated 3439 homes. Total housing potential listed was 14057 but there was a provision of only 13,040 in 2014 policy 2, which means that nearly 25% was allocated originally for town/urban in 2014. However the parameters of site allocations seem to have altered which now masks the true extent of the shift from urban to rural. For example, A24 Slyfield (1000 homes), A25 Gosden Hill Farm (2000 homes) and A26 Blackwell Farm (1800 homes) are now designated as “Guildford urban area” whereas in 2014 these 3 sites were allocated as “land around Guildford urban area”. The 2016 PSLP town centre and urban area (excluding Slyfield, Gosden Hill and Blackwell Farm sites) on a like for like basis give a housing provision of 2108 homes with a total housing figure of 13860 which means only 15% of new homes are allocated in the original definition of the town centre or urban area, against the 25% allocation in 2014.

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<th>Area allocation</th>
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<td>1939</td>
<td>1135</td>
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<tr>
<td>Urban area (exc Gos, Sly &amp; Bla)</td>
<td>1500</td>
<td>973</td>
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<td>Slyfield, Gosden, Blackwell</td>
<td>5250</td>
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RPC takes issue with the approach taken to meeting housing need within the Borough as a whole and objects to adopting the whole of the OAN as the housing requirement in a Borough which is almost 90% Green Belt and which contains significant areas of AONB.

20. RPC note that Core Strategies in other constrained areas have been found to be “sound” despite a housing requirement significantly below AON. (see for example Brighton and Hove City Plan 2016).

The approach taken by the Council does not appear to have understood or followed the decision of the Court of Appeal and judgement of Lord Justice Keene in City of St Albans v Hunston Properties plc [2013]EWCA Civ 1610 at

“There is no doubt, that in proceeding their local plans, local planning authorities are required to ensure that the “full objectively assessed needs” for housing are to be met, “as far as is consistent with the policies set out in this Framework”. Those policies include the protection of Green Belt land. Indeed, a whole section of the Framework, Section 9, is devoted to that topic, a section which begins by saying “The Government attaches great importance to Green Belts”: Paragraph 79. The Framework seems to envisage some review in detail of Green Belt boundaries through the new Local Plan process, but states that “the general extent of Green Belts across the country is already established.” It seems clear, and is not in dispute in this appeal, that such a Local Plan could properly fall short of meeting the “full objectively assessed needs” for
Despite this clear guidance from the Court of Appeal, the Council appears to have adopted the full OAN as the basis for the Plan. This in turn, and taken together with the emphasis on providing new housing in the Green Belt has led to removal of protection of the Green Belt from places previously within the Green Belt, by insetting of land in and around settlements to exclude them from the Green Belt and by the allocation of land within the Green Belt in order to allocate it for housing.

While RPC has not carried out its own OAN assessment it is noted that Table 1 of the PSLP indicates delivery well excess of the requirement identified in Policy S2 for the period 2018-2033. Paragraph 4.1.12 of the Plan confirms that the number of new homes shown in Table 1 is greater than the figure in the policy and purports to justify this as building flexibility into the plan and to demonstrate that the strategy is capable of delivering the target. The extent of oversupply in the Plan (130% of OAN) is not a figure derived from national policy and appears to be arbitrarily chosen. National policy in the NPPF states the requirement “to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework”. NPPF 82 states: “Once established, Green Belt boundaries should only be altered in exceptional circumstances…” There is no “exceptional” need for flexibility in Guildford Borough and certainly no case is made out to support such a significant over-supply.

In all the circumstances, RPC do not accept that either the housing requirement of 693 dwellings per annum or the proposed Table 1 delivery is reasonably justified. The plan has not been drawn up in conformity with the NPPF. The balance between housing need and the exceptional circumstances required to justify Green Belt boundary alterations is not made out.

The policies of the Plan are therefore not “sound” in this important respect and both the requirement in Policy S2 and the Planned Delivery between 2018 and 2033 should be modified by significant reductions in the number of dwellings proposed in each case.

Accordingly, RPC objects to the scale and distribution of housing proposed in Table 1 of the Plan “Proposed Delivery between 2018 and 2033”. The proposed delivery plan does not constitute sustainable development, would result in loss of rural character, harm to heritage assets, urbanisation, increased traffic and intensification of use and social isolation and harm to community cohesion.

RPC considers that the proposed Planned Delivery is so misconceived and so fundamental to the Plan that it is hard to see how it could be modified without large tracts of the Plan being re-written. Without substantial modification and rewriting, the Plan is not sound within the meaning of section 20 and paragraph 181 of the NPPF. RPC recommends that the Plan should be withdrawn or at least substantially modified by reducing significantly and re-distributing new housing currently proposed for the rural area in Table 1 Planned Delivery and by making consequent main modifications to the Plan.

RPC consider that the spatial strategy does not represent sustainable development, is not sound within the meaning of section 20 and paragraph 182 of NPPF and fails to address the key issues for Guildford in a sound and sustainable way.

119. The Plan will not deliver sustainable development in accordance with the policies of the Framework. Rather it will lead to serious degradation of the rural environment, erosion and piecemeal development of vital Green Belt land, cause harm to heritage assets, the intensification of use and urbanisation and access to new development principally by motor car, leading to congestion or upgrading of rural roads at the expense of rural character.

120. The effect on existing and future residential communities will be diminution in social cohesion, reduced quality of life and substantial harm to the amenity.
121. The overall housing land requirement in Policy S2 and the Proposed Delivery of housing in Table 1 of the Plan, as well as individual allocations in the Plan considered above, are not founded on a robust and credible evidence base.

122. The planned 30% oversupply of housing sites will make monitoring impossible and will lead to a de facto housing requirement which significantly exceeds the OAN.

123. RPC objects to the above proposals in the PSLP in principle and on the basis of the above comments and recommendations and asks that the Plan should be modified accordingly or withdrawn.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/531</th>
<th>Respondent: 15278369 / Ripley Parish Council (Jim Morris)</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

9. RPC has concluded that, without modification, the Plan cannot be considered “sound” within the meaning of Section 20 of the 2004 Act and paragraph 182 of the NPPF.

12. RPC are not satisfied that the documents have been made available in accordance with Regulation 19. In particular the Transport Document not being available until 6 June 2016. What RPC describe as “constant alterations to the website throughout the consultation period and, in particular the late substitution of Garlick’s Arch for the previous A43 allocation, which was not disclosed until the publication of the PSLP on 6 June 2016.

Housing Need Calculation
14. RPC object to the approach taken to the assessment and calculation of the housing requirement in the plan.

15. The PSLP seeks to meet OAN by delivering 693 pa during the plan period, an overall figure of 13,860 in the plan period with delivery of housing numbers increasing from 500 per annum in 2018-19 to 790 p.a. in 2032/33.

16. The justification for this is explained in the Sustainability Appraisal June 2016 at para 6.2.10: (Text not copied)

17. While Guildford Town Centre and urban area takes 2,742 units. This is less than 14% of the total projected housing requirement and much of the remaining 11,000 homes are to be accommodated in urban and village extensions (mainly open countryside around existing settlements) and in rural areas including what are called “inset villages” - effectively a redrawing of Green Belt boundaries to exclude former Green Belt villages and open land surrounding them from the protection of Green Belt designation. Of the 11,000 non-Town Centre requirement over 50% are being planned for the 3
North East Wards of Lovelace, Send and Clandons/Horsleys. This is disproportionate and unacceptable for such a small and sparsely populated area.

18. It is noted that there is a significant shift in the balance of urban to rural housing site allocation at the expense of the Green Belt, when comparing the housing allocations in 2016 in comparison to the 2014 draft Plan. In the 2014 Plan Guildford town centre and urban area was allocated 3439 homes. Total housing potential listed was 14057 but there was a provision of only 13,040 in 2014 policy 2, which means that nearly 25% was allocated originally for town/urban in 2014. However the parameters of site allocations seem to have altered which now masks the true extent of the shift from urban to rural. For example, A24 Slyfield (1000 homes), A25 Gosden Hill Farm (2000 homes) and A26 Blackwell Farm (1800 homes) are now designated as “Guildford urban area” whereas in 2014 these 3 sites were allocated as “land around Guildford urban area”. The 2016 PSLP town centre and urban area (excluding Slyfield, Gosden Hill and Blackwell Farm sites) on a like for like basis give a housing provision of 2108 homes with a total housing figure of 13860 which means only 15% of new homes are allocated in the original definition of the town centre or urban area, against the 25% allocation in 2014.

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19. RPC takes issue with the approach taken to meeting housing need within the Borough as a whole and objects to adopting the whole of the OAN as the housing requirement in a Borough which is almost 90% Green Belt and which contains significant areas of AONB.

20. RPC note that Core Strategies in other constrained areas have been found to be “sound” despite a housing requirement significantly below AON. (see for example Brighton and Hove City Plan 2016).

21. The approach taken by the Council does not appear to have understood or followed the decision of the Court of Appeal and judgement of Lord Justice Keene in City of St Albans v Hunston Properties plc [2013]EWCA Civ 1610 at “There is no doubt, that in proceeding their local plans, local planning authorities are required to ensure that the “full objectively assessed needs” for housing are to be met, “as far as is consistent with the policies set out in this Framework”. Those policies include the protection of Green Belt land. Indeed, a whole section of the Framework, Section 9, is devoted to that topic, a section which begins by saying “The Government attaches great importance to Green Belts”: Paragraph 79. The Framework seems to envisage some review in detail of Green Belt boundaries through the new Local Plan process, but states that “the general extent of Green Belts across the country is already established.” It seems clear, and is not in dispute in this appeal, that such a Local Plan could properly fall short of meeting the “full objectively assessed needs” for housing in its area because of the conflict which would otherwise arise with policies on the Green Belt or indeed on other designations hostile to development, such as those on Areas of Outstanding Natural Beauty or National Parks.”

22. Despite this clear guidance from the Court of Appeal, the Council appears to have adopted the full OAN as the basis for the Plan. This in turn, and taken together with the emphasis on providing new housing in the Green Belt has led to removal of protection of the Green Belt from places previously within the Green Belt, by insetting of land in and around settlements to exclude them from the Green Belt and by the allocation of land within the Green Belt in order to allocate it for housing.

23. While RPC has not carried out its own OAN assessment it is noted that Table 1 of the PSLP indicates delivery well excess of the requirement identified in Policy S2 for the period 2018-2033. Paragraph 4.1.12 of the Plan confirms that the number of new homes shown in Table 1 is greater than the figure in the policy and purports to justify this as building flexibility into the plan and to demonstrate that the strategy is capable of delivering the target. The extent of oversupply in the Plan (130% of OAN) is not a figure derived from national policy and appears to be arbitrarily chosen. National policy in the NPPF states the requirement “to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework”. NPPF 82 states: “Once established, Green Belt boundaries should only be altered in exceptional circumstances…” There is no
“exceptional” need for flexibility in Guildford Borough and certainly no case is made out to support such a significant over-supply.

24. In all the circumstances, RPC do not accept that either the housing requirement of 693 dwellings per annum or the proposed Table 1 delivery is reasonably justified. The plan has not been drawn up in conformity with the NPPF. The balance between housing need and the exceptional circumstances required to justify Green Belt boundary alterations is not made out.

25. The policies of the Plan are therefore not “sound” in this important respect and both the requirement in Policy S2 and the Planned Delivery between 2018 and 2033 should be modified by significant reductions in the number of dwellings proposed in each case.

Insetting of Green Belt

39. The approach adopted by the GBC in the Local plan is to exclude land in and surrounding rural settlements from the protection of Green Belt designation by “insetting” of land some of which continues to serve the Green Belt purposes and contributes to the openness of the Green Belt.

40. The approach appears to have taken place as a significant general shift in policy, rather than on the basis of an assessment, in each case, of the extent to which the land in question still serves GB functions.

41. The “exceptional circumstances” required to justify amendment of GB boundaries are not identified.

42. The exclusion of these areas is not in accordance with the guidance in the NPPF. Unless this policy is modified the Plan cannot be “sound” and the criteria in Section 20 of the 2004 Act are not met.

43. RPC objects to the proposed insetting of rural villages so as to exclude them from the Green Belt protection.

44. There are no exceptional circumstances which justify such an approach and it does not follow or accord with the guidance in the NPPF set out above.

45. This Report is particularly concerned at the following insetting: (1) the insetting of Ripley Village; (2) the Send Marsh/Burnt Common insetting.

46. There is no change of circumstances or exceptional circumstances which justify the insetting.

47. While RPC objects to the general approach to insetting in principle, it also objects to alignment of the boundary of the insetting, which has been drawn too widely and without proper or any regard to the character of the land to be excluded from the Green Belt or the extent to which it continues to fulfil Green Belt purposes.

48. RPC objects in particular to the insetting of land to the rear of the Talbot and the allocation A45. (above) The land to the rear of the built development behind the Talbot beyond the light industrial buildings is open land and forms a valued part of the rural setting of the village.
49. RPC takes the view that the insetting of Ripley Village has been far too widely drawn. The NPPF para 86 states: “If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt.”

50. Whilst acknowledging that much of the Village of Ripley is in a widely drawn conservation area RPC consider that the open character of the village does make an important contribution to the openness of the Green Belt which justifies retention of its existing Green Belt status.

51. Accordingly RPC objects to the insetting of Ripley from the Green Belt, both in principle and in detail. The Plan is not “sound” in this respect and RPC recommends that the Plan should be modified to retain the village entirely in the Green Belt. If this objection is rejected, and the village is to be inset, the boundary should be drawn more tightly into the existing village built envelope and the paddock are to the rear of The Talbot excluded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Report on Guildford LP Reg 19 (V4) FINAL 17.7.16.pdf (489 KB)
See comments in attached report. The Plan is not sound. It is fundamentally flawed in the scale and distribution of housing land. It does not provide a basis for sustainable development to meet the key requirement of the Guildford Borough Plan area. It is likely that significant parts of the Plan will not be deliverable. It overprovides for housing delivery and as a result would lead to permanent environmental degradation, intensification of traffic and use of infrastructure, and irreversible damage to the rural landscape and heritage assets and social isolation.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:** [Report on Guildford LP Reg 19 (V4) FINAL 17.7.16.pdf](#) (489 KB)

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

8. The meaning of the term “sound” is explained in the National Planning Policy Framework at paragraph 182:

“182 The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is “sound” – namely that it is:

- Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.”

9. RPC has concluded that, without modification, the Plan cannot be considered “sound” within the meaning of Section 20 of the 2004 Act and paragraph 182 of the NPPF.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

Ripley Parish Council wishes to appear and participate at the Examination and intends to be represented by Counsel for the purpose of supporting their objections and recommended modifications and to respond to any proposals and further information proposed by Guildford Borough Council or the Inspector.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/2013   Respondent: 15278369 / Ripley Parish Council (Jim Morris)   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

6. Guildford PSLP is the draft Local Development Document proposed to be submitted to the Secretary of State under Regulation 19 of the 2012 Regulations. It seeks to establish the principal land uses for the District. It is accompanied by the Sustainability Appraisal June 2016 which includes the Strategic Environmental Assessment 2016 prepared by AECOM Infrastructure and Environment UK Limited.

7. Preparation of Local Development Documents is covered by Section 19 of the Planning and Compulsory Purchase Act 2004. The PSLP will, in due course be submitted to independent examination under Section 20 of the 2004 Act, subsection (5) of which provides:

“(5) The purpose of an independent examination is to determine in respect of the development plan document -
(a) whether it satisfies the requirements of sections 19 and 24 (1), regulations under section 17 (7) and any regulations under section 36 relating to the preparation of development plan documents;
(b) whether it is sound; and
(c) whether the local planning authority complied with any duty imposed on the authority by section 33A in relation to its preparation. “


11. Regulation 19 of the Local Plan Regulations provides:

“Publication of a local plan 19. Before submitting a local plan to the Secretary of State under section 20 of the Act, the local planning authority must— (a) make a copy of each of the proposed submission documents and a statement of the representations procedure available in accordance with regulation 35, and (b) ensure that a statement of the representations procedure and a statement of the fact that the proposed submission documents are available for inspection and of the places and times at which they can be inspected, is sent to each of the general consultation bodies and each of the specific consultation bodies invited to make representations under regulation 18(1). Representations relating to a local plan.”
12. RPC are not satisfied that the documents have been made available in accordance with Regulation 19. In particular the Transport Document not being available until 6 June 2016. What RPC describe as “constant alterations to the website throughout the consultation period and, in particular the late substitution of Garlick’s Arch for the previous A43 allocation, which was not disclosed until the publication of the PSLP on 6 June 2016.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/534  Respondent: 15278369 / Ripley Parish Council (Jim Morris)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

See reports attached.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?


Comment ID: pslp172/2785  Respondent: 15278369 / Ripley Parish Council (Jim Morris)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Allocation A58 and Amendments to Policy E1.
3.2 E1(4) identifies the Strategic Employment Sites as making up the borough’s core supply of employment land. A subclass of Strategic Employment Sites are Industrial Strategic Employment Sites. There are 11 existing Industrial SES identified in the policy at D1(7). Industrial SES are treated as suitable for B1(c) light industrial, B2 general industrial and B8 storage and distribution.

3.3 However, paragraph 4.4.32a of the “Reasoned justification” states: “Development involving waste management facilities may be appropriate and will be directed to the Industrial Strategic Employment Sites. The Surrey Waste Plan (2006) policy CW5: Location of Waste Facilities gives priority to industrial/employment sites, particularly those in urban areas, and to any other suitable urban sites and then to sites close to urban areas and to sites easily accessible by the strategic road network. Some waste management activities fall within the industrial classes in the Use Classes Order and can be considered to be a B1c, B2 or B8 use. This is particularly the case given the increased move towards enclosing
waste management activities in purpose designed buildings. However, some do not fall within specific use classes and are therefore sui generis use.”

3.4 To the existing core of employment sites is proposed the allocation (A58) an additional Industrial Strategic Employment Site at Burnt Common (Amendment 1). The proposal is for 7000 square metres of space within use classes B1(c) (light industrial), B2 General Industrial and B8 Storage and Distribution, and “with potential for further industrial floorspace to meet borough needs”. No justification or criteria are provided to explain its identification or selection but it is assumed that it is based on the existing warehouse on the site having established an employment use of the site.

3.5 The site is currently in the Green Belt and it is proposed that the GB boundary will be amended to exclude the entire site.(Amendment 2).

3.6 Policy E1(8) (as amended) states: “When developed the new employment land at Burnt Common, together with the existing employment floorspace, will be treated as Industrial Strategic Employment Land.”

3.7 These amendments taken together cause a number of specific concerns on the basis of which the Parish Council OBJECTS to the proposed amendments.

3.8 Effectively new Allocation A58 together with the changes to Policy E1 and their associated text in the reasoned justification, provides a clear basis for the provision of a new major strategic site which would be available and treated as suitable for new waste management development on a site currently in the Green Belt.

3.9 The Parish Council considers that such a use on this site would be inappropriate for the following reasons. The site would almost directly adjoin the new housing site at A43 and would be a potential “bad neighbour development”. The open ended nature of the policy which appears to provide no limit on the extent of development depending on “the borough’s needs” adds to the growing sense of alarm that the policy ground is being prepared for industrial or waste use which could have serious environmental consequences for the Parish and its community. The existence of the current warehouse on the site does not justify the intensification of industrial uses on a site of the size proposed in this rural location. Waste management uses would be particularly unwelcome. Other concerns are the lack of specific controls on traffic generation, ensuring that any such development is contingent on appropriate highway improvements (such as the new slip roads to the A3) and to ensure that heavy vehicles associated with the development are not able to access the rural road network.

3.10 If, contrary to the Parish Council’s objection, such an allocation was to proceed to adoption, the need for the protection of the landscape and countryside and local residential amenity would mean that there must be limits on height and footprint of buildings, the scale and nature of circulation and parking areas (especially HGV parking) and other infrastructure, the use of materials, advertising and signage. Lighting would need to be controlled, to prevent intrusive all night floodlighting of the site. Such is the importance of these factors that they should be written into the policy for this site allocation.

3.11 The location for a waste management facility in the countryside ought to be subject to a full sequential site analysis and suitable locations should be identified in the plan making process in an open and transparent way, considering alternative sites higher up the sequential hierarchy, rather than being designated under the guise of a standard industrial allocation.

3.12 The allocation policy should be the subject of a full sequential site assessment in accordance with the Waste Local Plan. Such facilities should be planned on a county wide basis, given their strategic importance and the County level waste authority’s responsibilities.

3.13 If, contrary to the Parish Council’s in principle objection, the allocation was to proceed to adoption, they would promote a modification to specifically rule out waste management, especially any open air or unenclosed waste management, irrespective of whether or not such waste management was to fall within Use Classes B1(c), B2 or B8. The Policy should specifically state that notwithstanding the Use Classes Order 1987, waste management uses shall be considered unsuitable uses on the A58 site and in any case, no such use shall take place on the site without specific grant of planning permission.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Allocation A58 and Amendments to Policy E1.

3.2 E1(4) identifies the Strategic Employment Sites as making up the borough’s core supply of employment land. A sub class of Strategic Employment Sites are Industrial Strategic Employment Sites. There are 11 existing Industrial SES identified in the policy at D1(7). Industrial SES are treated as suitable for B1(c) light industrial, B2 general industrial and B8 storage and distribution.

3.3 However, paragraph 4.4.32a of the “Reasoned justification” states: “Development involving waste management facilities may be appropriate and will be directed to the Industrial Strategic Employment Sites. The Surrey Waste Plan (2006) policy CW5: Location of Waste Facilities gives priority to industrial/employment sites, particularly those in urban areas, and to any other suitable urban sites and then to sites close to urban areas and to sites easily accessible by the strategic road network. Some waste management activities fall within the industrial classes in the Use Classes Order and can be considered to be a B1c,B2 or B8 use. This is particularly the case given the increased move towards enclosing waste management activities in purpose designed buildings. However, some do not fall within specific use classes and are therefore sui generis use.”

3.4 To the existing core of employment sites is proposed the allocation (A58) an additional Industrial Strategic Employment Site at Burnt Common (Amendment 1). The proposal is for 7000 square metres of space within use classes B1(c) (light industrial), B2 General Industrial and B8 Storage and Distribution, and “with potential for further industrial floorspace to meet borough needs”. No justification or criteria are provided to explain its identification or selection but it is assumed that it is based on the existing warehouse on the site having established an employment use of the site.

3.5 The site is currently in the Green Belt and it is proposed that the GB boundary will be amended to exclude the entire site.(Amendment 2).

3.6 Policy E1(8) (as amended) states: “When developed the new employment land at Burnt Common, together with the existing employment floorspace , will be treated as Industrial Strategic Employment Land.”

3.7 These amendments taken together cause a number of specific concerns on the basis of which the Parish Council OBJECTS to the proposed amendments.

3.8 Effectively new Allocation A58 together with the changes to Policy E1 and their associated text in the reasoned justification, provides a clear basis for the provision of a new major strategic site which would be available and treated as suitable for new waste management development on a site currently in the Green Belt.

3.9 The Parish Council considers that such a use on this site would be inappropriate for the following reasons. The site would almost directly adjoin the new housing site at A43 and would be a potential “bad neighbour development”.

Attached documents:
ended nature of the policy which appears to provide no limit on the extent of development depending on “the borough’s needs” adds to the growing sense of alarm that the policy ground is being prepared for industrial or waste use which could have serious environmental consequences for the Parish and its community. The existence of the current warehouse on the site does not justify the intensification of industrial uses on a site of the size proposed in this rural location. Waste management uses would be particularly unwelcome. Other concerns are the lack of specific controls on traffic generation, ensuring that any such development is contingent on appropriate highway improvements (such as the new slip roads to the A3) and to ensure that heavy vehicles associated with the development are not able to access the rural road network.

3.10 If, contrary to the Parish Council’s objection, such an allocation was to proceed to adoption, the need for the protection of the landscape and countryside and local residential amenity would mean that there must be limits on height and footprint of buildings, the scale and nature of circulation and parking areas (especially HGV parking) and other infrastructure, the use of materials, advertising and signage. Lighting would need to be controlled, to prevent intrusive all night floodlighting of the site. Such is the importance of these factors that they should be written into the policy for this site allocation.

3.11 The location for a waste management facility in the countryside ought to be subject to a full sequential site analysis and suitable locations should be identified in the plan making process in an open and transparent way, considering alternative sites higher up the sequential hierarchy, rather than being designated under the guise of a standard industrial allocation.

3.12 The allocation policy should be the subject of a full sequential site assessment in accordance with the Waste Local Plan. Such facilities should be planned on a county wide basis, given their strategic importance and the County level waste authority’s responsibilities.

3.13 If, contrary to the Parish Council’s in principle objection, the allocation was to proceed to adoption, they would promote a modification to specifically rule out waste management, especially any open air or unenclosed waste management, irrespective of whether or not such waste management was to fall within Use Classes B1(c), B2 or B8. The Policy should specifically state that notwithstanding the Use Classes Order 1987, waste management uses shall be considered unsuitable uses on the A58 site and in any case, no such use shall take place on the site without specific grant of planning permission.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
2.4 Annex 1 Glossary of the Government Guidance on Travellers “Planning Policy for Travellers” 2012 identifies the fact that traveling show people often need mixed use “plots” to accommodate their equipment:

“5. For the purposes of this planning policy, “pitch” means a pitch on a “gypsy and traveller” site and “plot” means a pitch on a “travelling showpeople” site (often called a “yard”). This terminology differentiates between residential pitches for “gypsies and travellers” and mixed-use plots for “travelling showpeople”, which may / will need to incorporate space or to be split to allow for the storage of equipment.”

2.5 However, policy makes no distinction between travelling show people and other travellers and gypsies, despite their different needs and makes it clear that local plans should seek to meet their needs working in collaboration with adjoining districts.

2.6 The Reg 19 draft Plan identifies a ratio of 1 traveller site per 500 new housing units. 500 units is the minimum site unit number to justify traveller site inclusion. The allocation A43 provides 6 travelling show people’s plots for an overall housing development of 400 units; a 750% increase over the policy H1 figure, if applied in this way, and representing the major part of the 6-8 permanent travelling show peoples’ plots for the entire borough, on one site, in a location which extends the allocation site on land currently identified as Ancient Woodland.

2.7 The approach to allocation of travelling showmen plots within the site does not appear to be justified anywhere in the draft Plan, not is any basis for the selection of this site as being particularly suitable for such use.

2.8 Travelling showpeople have specific needs, including buildings and compounds for secure storage of large vehicles, plant and machinery. Their work and travelling is often seasonal but can lead to additional traffic, including the movement of very large specialist vehicles, plant and machinery which can cause substantial disruption.

2.9 The Parish Council considers that the most successful sites are stand-alone sites with direct access to major roads. The proposed location (probably in the far North corner of the site) is inappropriate, not only in that it affects land recorded as ancient woodland, but also because it is likely to be a poor neighbour to residential development of the kind shown and will probably require large commercial vehicles to use estate roads.

2.10 The combination of travelling showpeople’s accommodation and new general housing is an unsatisfactory one and is likely to impact on viability which will have consequences for the delivery of much needed affordable housing to meet, in particular, local needs. Attempting to tuck the use away in the far northern corner of the A43 site will not be a satisfactory solution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/725  Respondent: 15278401 / Elizabeth Wallis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Shalford (south)

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I have studied the proposed changes to the Green Belt/Settlement Boundary for Shalford and I strongly object to these proposals. I am a property owner in Chinthurst Park.

These fields form an important part of the open and attractive character of Shalford Village and provide a rural backdrop. The fundamental aim of green belt policy is to prevent urban sprawl by keeping land permanently open, and consequently the most important attribute of green belts is their openness.

These fields are currently within the Green Belt and AGLV and this level of protection should remain. The land has not changed so why should the level of protection? The fields significantly contribute to the openness of the Green Belt because of their height - they rise to almost 10 metres above the Kings Road and over 7.5 metres above the Village Hall. This means that any housing development built there would dominate the village landscape especially from the Village Green.

I see that access to the proposed development is via Chinthurst Lane. Chinthurst Lane is a narrow and windy country lane and it can barely cope with the current volume of traffic – it certainly could not sustain traffic from a development of this size. In addition the local infra structure including the school and medical facilities just cope with the existing number of residents.

Finally AGLV has been a long standing policy designation in Surrey, identifying land of particularly high landscape value which lies immediately outside the AONB. The current GBC Local Plan has a specific policy in this regard. Policy RE6 states that development within the Area of Great Landscape Value should be consistent with the intention of protecting the distinctive landscape character of the area. The Guildford Landscape Character Assessment & Guidance published in 2007 by Guildford Borough Council and Landuse Consultants discussed as a key landscape characteristic the "panoramic views across the landscape from Chinthurst Hill". It notes among the key positive landscape attributes that contribute to the character of the area and that should be conserved and enhanced as being: Remote, peaceful and unsettled character - Mixed woodlands - Rural roads and sunken lanes. This landscape needs to be preserved and not destroyed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/727  Respondent: 15278433 / Michael Shaverin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Guildford Urban Area

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object strongly to the Guildford Local Plan.

I am dismayed to see the local plan for Guildford containing so many new housing sites. There appears to be a serious lack of understanding as to the impact that such quantities of new housing will have to my area, Burpham and the wider Guildford region…(afterall, just putting a new Aldi store in Burpham has generated traffic carnage at times).

- There is already a woeful lack of infrastructure (road capacity, schools, shops, doctors surgeries etc)
- No doubt you will again not prescribe decent levels of parking per household which will again blight the existing and new areas
- All the green spaces will be sucked out of the area, causing more car journeys to get out of the ‘town’, plus untold damage to wildlife and flood risk etc

- Do you really need all of the housing now, afterall the economy is going to slide off a cliff now the Tories have allowed a Brexit vote…

- Where will the people come from to buy such houses, if T.May gets to be PM and is negotiating on the residency status of 2million+ EU citizens and they end up leaving won’t we have too many unoccupied houses already that could be used?

- This is massively over developing the area – a total of 14,000 new homes are proposed, a whole new town effectively!

There are many more concerns, this appears to be a whole bucket list of crazy plans on one document. I am all for development and new houses, but really, 14,000!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/728  Respondent: 15278465 / Chris Wright  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Clandon

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I am writing to register the strongest possible objection to all of the element of the draft local plan 2016 which affect West Clandon.

As a long standing resident of the village of West Clandon, I object to the way in which successive administrations seem determined to destroy forever the nature of the village by pressing ahead with unnecessary and ill-advised development plans, much of which would be on protected green belt land.

I chose to settle in this quiet, semi-rural location rather than embrace city life closer to Guildford. This way of life is now clearly under threat. My son and I make regular use of the open spaces that surround the village. Once these are gone, we will have no choice but to add to road congestion by traveling in a car in order to seek out the next nearest open spaces.

The village has a documented history going back hundreds of years, and local residents are proud to uphold this heritage through a vibrant community which celebrates, and thrives because of, the separation of the village from surrounding conurbations. The developments proposed for West Clandon will therefore not only destroy forever the clean, open, rural green belt land which is extensively used for recreational purposes, but also the community feeling and spirit which will disappear once the process of subsuming Clandon within the wider urban sprawl commences.

This Plan is unsustainable, unworkable and, in many provisions, unnecessary. Specifically, I object to the following elements of the Local Plan:
1. I OBJECT to Gosden Hill development being in the Local Plan. The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.
The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8319  Respondent: 15278465 / Chris Wright  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/18677  Respondent: 15278465 / Chris Wright  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18674  Respondent: 15278465 / Chris Wright  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18675  Respondent: 15278465 / Chris Wright  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

• To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

• To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

• To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

• To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly. I’d be grateful if you could confirm by return safe receipt of this objection.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/18681  Respondent: 15278465 / Chris Wright  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.
I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18682  Respondent: 15278465 / Chris Wright  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H3 – Rural Exception Homes

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18678  Respondent: 15278465 / Chris Wright  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

1. I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.
Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18679  Respondent: 15278465 / Chris Wright  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18680  Respondent: 15278465 / Chris Wright  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans.
This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/18672  Respondent: 15278465 / Chris Wright  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/18673  Respondent: 15278465 / Chris Wright  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/18671 **Respondent:** 15278465 / Chris Wright **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18670  Respondent: 15278465 / Chris Wright  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the Borough Wide Strategy (Policy S2)
   a. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.
   b. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.
   c. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any commonsense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.
The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2335  Respondent: 15278529 / Ken Tough  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the 2016 Draft Local Plan. With around 6000 of the proposed 14,000 new homes to be built within a few miles of the Burpham area, I find this a disproportionate level of development in one part of the Borough. Furthermore, much of this is on the green belt, there is no apparent provision for appropriate improvements to either the A3 or local roads, and there is a distinct lack of details of essential infrastructure required to support such developments.

It is deeply concerning that developments on such a scale are being proposed without specific infrastructure details or indeed the evidence for such housing requirements in the Borough.

I sincerely hope that you will reconsider the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1183  Respondent: 15278689 / F Robertson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Dear Sirs,

I wish to make clear I do not favour the development proposal Policy A46 for the following reasons: The land is not 'safeguarded' for planning; it is still in the Green Belt and no special circumstances have been produced to suggest it should not remain so.

The need for a secondary school in Normandy has not been proven, but the school is the basis of the development. If the school requirement is not proven (some nearby secondary schools are undersubscribed and none are over-subscribed), the need for the houses to be there is also not proven. So there is no need locally for a school or so many houses.
The development site is within a kilometre of the **Thames Basin Heaths Special Protection Area**, when that protection area extends for five kilometres, so the development is in direct conflict and disregard of the TBHSPA.

The proposed area for **SANG at Russell Farm** would mean the loss of fine agricultural land for an inadequate scheme that even National Heritage can't approve. Plus the likelihood of 2000 new Normandy residents travelling that distance to walk their dogs, rather than resorting to the much closer, larger, more attractive heathland, is slim.

Please note this potential SANG is not large enough to fulfil SANG requirements (that one can walk for at least a kilometre without recrossing one's path in the process), it is not within easy walking distance of the community it is proposed to serve (ie Normandy residents) and it is not required by the residents of Wood Street, where it is situated. It appears as merely a sop to the planners, rather than a well-thought out alternative to the huge loss of the productive agricultural land outlined in **Policy A46**.

The development **Policy A46** requires **adequate roads** to service it. But the land under consideration is bordered by two country lanes - Glaziers Lane and Westborough Lane. Those lanes are edged with houses. Widening them, therefore, is impossible, so how they are to be made 'adequate' for double the traffic they carry already? It couldn't be done in the necessary timescale; it's doubtful it could be done at all. There are also two railway bridges on these lanes. One is a narrow, 'blind' hump-backed bridge, the other, which goes over the road, reduces the lane to a single car, requiring folk to wait and give way. It is easy to see how double the traffic down either lane will result in traffic jams and even accidents.

The development outlined in **Policy A46** will also require **adequate sewage provision**. Thames Water has admitted that this is currently at capacity in Normandy and residents of Glaziers Lane can see it is in excess of capacity during heavy rain, when sewage appears in their gardens. The provision of a fit-for-purpose sewage system that can cope with the current population is urgently needed and overdue. If Thames Water can't manage this, it is not doubtful they could manage the sewage output of another 1100 homes in the same area? A public health disaster awaits.

Overall, **Policy A46** would change the village from a collection of hamlets currently separated by the Green Belt to double its size and destroy its current character in the process. As a resident of some twenty-five years, I do not oppose modest development in Normandy and indeed have seen some that I support, especially the provision of social housing near the village hall, the private development on Westwood Lane where once a garage stood, and the thoughtful housing association homes in Beech Lane. They were on a human scale and they haven't badly affected the village.

**But Policy A46** will. It is clearly developer led, rather than locally desired, or socially aware, and will please only those who have the money to buy houses at the current inflated rate, the landowner who stands to earn a million pounds an acre when he sells his current agricultural land as building land, and the developers who will reap the profits of an inflated housing market.

It leads one to muse upon why those elected to represent local people promote schemes that local people do not want, but developers and landowners do.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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I wish to make clear I do not favour the development proposal **Policy A46** for the following reasons:

The land is not 'safeguarded' for planning; it is still in the **Green Belt** and no special circumstances have been produced to suggest it should not remain so.
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The development Policy A46 requires adequate roads to service it. But the land under consideration is bordered by two country lanes - Glaziers Lane and Westborough Lane. Those lanes are edged with houses. Widening them, therefore, is impossible, so how they are to be made 'adequate' for double the traffic they carry already? It couldn't be done in the necessary timescale; it's doubtful it could be done at all. There are also two railway bridges on these lanes. One is a narrow, 'blind' hump-backed bridge, the other, which goes over the road, reduces the lane to a single car, requiring folk to wait and give way. It is easy to see how double the traffic down either lane will result in traffic jams and even accidents.

The development outlined in Policy A46 will also require adequate sewage provision. Thames Water has admitted that this is currently at capacity in Normandy and residents of Glaziers Lane can see it is in excess of capacity during heavy rain, when sewage appears in their gardens. The provision of a fit-for-purpose sewage system that can cope with the current population is urgently needed and overdue. If Thames Water can't manage this, it is not doubtful they could manage the sewage output of another 1100 homes in the same area? A public health disaster awaits.

Overall, Policy A46 would change the village from a collection of hamlets currently separated by the Green Belt to double its size and destroy its current character in the process. As a resident of some twenty-five years, I do not oppose modest development in Normandy and indeed have seen some that I support, especially the provision of social housing near the village hall, the private development on Westwood Lane where once a garage stood, and the thoughtful housing association homes in Beech Lane. They were on a human scale and they haven't badly affected the village.

But Policy A46 will. It is clearly developer led, rather than locally desired, or socially aware, and will please only those who have the money to buy houses at the current inflated rate, the landowner who stands to earn a million pounds an acre when he sells his current agricultural land as building land, and the developers who will reap the profits of an inflated housing market.

It leads one to muse upon why those elected to represent local people promote schemes that local people do not want, but developers and landowners do.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The access on to the A31 and the A3 with signals will jam two roads that are currently only rarely running freely during rush hour. It will make a questionable route almost impossible during those times. Astonished to read that this is deemed a viable way to 'drain' traffic generated from this site, a site which is truly not viable regarding the current proposed access to it, and is most unwelcome locally anyway. Air quality concerns aren't trivial either - they are of huge significance and alone reason to halt this plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Remove policy A26 from the local plan.

Attached documents:

Comment ID: pslp172/2669  Respondent: 15278689 / F Robertson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I think it unfortunate that this brownfield site is no longer to be developed for homes. Town centre accommodation of the sort outlined here would have been useful to provide sociable housing - a mixture of council-owned and privately owned homes that serve the community by being harmoniously mixed. Sorry to see this lost and wondering why it was. Would BT simply not sell the land?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2668  Respondent: 15278689 / F Robertson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
As a Normandy resident living in Christmas Pie, near the hamlet of Flexford, I am extremely relieved to see policy A46 abandoned. I felt it was planner-driven and unwarranted in terms of the needs of local residents. I am grateful that good sense prevailed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2671 Respondent: 15278689 / F Robertson Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A47

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Very pleased to see this land, which floods regularly and has water voles present on it, removed from the local plan and no longer considered suitable for building. A site of nature conservation interest shouldn't be used this way and it was wrong to consider it in the first place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/731 Respondent: 15278849 / Giordano Mion Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Guildford Urban Area

Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( Yes ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There is widespread anger within our community due to the intention to erect a burial ground (crematorium) in shocking proximity to our Stoughton/QEP area (area A23 on map appendix H) due to the following concerns 1) Health and environmental issues 2) Construction issues 3) Traffic congestion.

The studies of the negative impact of crematoriums in local health is well documented.

The area is permanently affected by traffic jams that will be worsened. Both conditions will lead to a negative drop in our life quality.

Our community hosts several families with young children (some of them suffering from asthma) that would be exposed to mercury pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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The studies of the negative impact of crematoriums in local health is well documented.

The area is permanently affected by traffic jams that will be worsened.

Both conditions will lead to a negative drop in our life quality.

Our community hosts several families with young children (some of them suffering from asthma) that would be exposed to mercury pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I have been examining Guildford proposed development plan and, while I am happy more housing has been planned, I am concerned about sufficient improvement in the transportation network being able to accommodate for more people and cars. The situation is already far from ideal, including parking, and I hope it does not get any worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
As a resident of Normandy I wish to register my objection to the proposal under the new draft Local Plan to release Site A46 from the Green Belt.
I do not believe that Guildford Borough Council have demonstrated the required "exceptional circumstances" to justify this proposed release within the Local Plan. The Local Plan does not adequately take into account the sensitive nature of the site or the impact on the local environment and no explanation has been given as to why this area is proposed for development as opposed to other more suitable locations within the Borough.
The local road and other transport infrastructure is already stressed and the proposed doubling in size of the local community would place huge additional pressure on an already overloaded road and transport system.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

### Comment ID: PSLPS16/1225  Respondent: 15279329 / Bonnar Allan  Agent:

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( Yes )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Proposed site allocation A46 (Land to the south of Normandy and north of Flexford) should be deleted from the Plan.
2. Land at Harper's Road/ Wyke Lane should be allocated in the emerging Plan for housing-led, mixed use development (please see attached representation for more details).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

- [160714 updated redline plan.pdf](#) (645 KB)
- [160718 Bonnar Allan Regulation 19 representation to Guildford BC July 2016.pdf](#) (440 KB)
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( Yes )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The currently allocated, fragmented development sites should be combined into one location to achieve sustainable development objectives and avoid coalescence. A single strategic location, near the railway station, facilitates a comprehensive masterplan to be prepared for the proposed allocation. This is required in order to ensure the provision of essential infrastructure, such as drainage improvements and a pedestrian and road bridge to replace the level crossing, high quality development and compliance with the full range of place-making criteria.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 160714 updated redline plan.pdf (645 KB) 160718 Bonnar Allan Regulation 19 representation to Guildford BC July 2016.pdf (440 KB)

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( Yes )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The proposed strategic allocation does not comply with the objectives of sustainable development and should be removed from the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 160714 updated redline plan.pdf (645 KB) 160718 Bonnar Allan Regulation 19 representation to Guildford BC July 2016.pdf (440 KB)

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The case for removing the Horsleys from the Green Belt (or "insetting" them) has not been made. They are open in appearance and character and epitomise the areas which Green Belt designation was designed to protect. The insetting will expose them to much weaker development constraints. This is evident in the plan to accommodate 60% more new housing (25% increase) than commensurate with the ONS' own projections for a 15% population increase in the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2374  Respondent: 15279649 / Martin Stringfellow  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Vision and ambition

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There is no comment on how the increased demand for non-transport related infrastructure in the Horsleys resulting from the massive number of new houses will be met. In particular, how can the increased demand for medical facilities be met?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/737  Respondent: 15279937 / Adam Hampton  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Normandy and Flexford

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

+Objection to planned construction within Normandy village

I, Adam Hampton, formally object to the construction of homes and businesses within the village of Normandy as propositioned by the plans that were made available earlier this year by Guildford borough council.

It is of my opinion that many points of contention have been consistently overlooked and ignored by the council when submission of planning for construction at the Normandy site was proposed; such points of contention I will outline below in a structured manner. My objections, along with most other objections from people in the area, can be divided into three main areas of concern, social, ecological and economical.
When looking at the proposition in a social aspect a number of key concerns are raised. How will the residents of this new development move during daily transit? How will the residents integrate into the current utilities infrastructure, namely the surgery? And will the new developments integrate into the existing character of the village, in style, layout and number?

Firstly, while it is a noble to assume that the residents and visitors of the 1000+ unit development will be making full use of the Wanborough rail transport links to Guildford and ash, to do so would be naïve on part of the borough and the developers. Assuming each resident will have on average of 2 residents, and assuming that those 2 residents do not share a car, as most do not. There will be a minimum of 2000+ new vehicles utilising the existing road infrastructure in addition to the many hundreds, if not thousands that do each day. If you also take into account the proposed school building and assume it is of mode size as outlined by government survey, there will be between 501-1000 pupils who will also need to be transported to the building. Adding, in the best case scenario, 500 more cars to the area every morning and evening. Currently the majority of traffic is transient, this would not be so if the development were allowed to go ahead. 2500 cars, at best, utilising the current road infrastructure at the rush hours of the morning and evening at the same time would be chaos, and in my opinion is enough argument already to prevent such a development from taking place.

Secondly, all of the new residents will be likely making use of the current surgery in Glazier’s lane, should the proposed development be allowed to take place. The current ability of existing residents to make appointments is already hindered by long wait times and lack of appointment places. Appointments have to consistently be made great lengths of time in advance, removing any sort of emergency response capacity of the surgery. It is self-explanatory that addition of yet more people to a problem already caused by lack of space will further hinder the services of the surgery, both for existing residents and future.

Thirdly, due to the nature and size of the development, integration with the surrounding area is highly limited and if not, improbable. It would incorrect to call this a housing development when its size greatly exceeds the size of the village as it currently is, and would be more appropriately titled a ‘village’ development. Its size would be essentially usurping the existing residents and character of the village and moving the centre of the village away from where it was once situated. If current development styles from sites in ash vale are to be taken as the industry standard, the house styles will not be in keeping of those currently in the village. The number of houses and the size of the plot will virtually guarantee that the houses cannot be of a size or shape similar to those that currently occupy the village proper.

From an ecological perspective, the development would be most damaging. We must ask a number of key questions when considering the development in this way. Will the development protect the existing wildlife and if so, to what degree? If damage is to be made, what forms will it likely take and what will be the further reaching impacts of the development on the surrounding ecology? Will any damage be transient or permanent?

To address the first question, no, there are no obvious provisions made to protect the existing wildlife. Any developments made, will be on Greenfield sites and as such will completely eradicate forever, any and all ecology that exited on the site and could exist there. Considering that the site is surrounded by ancient woodland, any wildlife on the site will be well established and flourishing in their niche and to disrupt this would be highly damaging. Increased urban presence will give rise to more urban dependant species such as foxes, urbanised pigeons and rats, which will outcompete the more sensitive countryside wildlife for food and territory, reducing the already limited biodiversity. It is astounding to think that in this age of renewable technology and sustainable planning, a green-field development is being even considered and preservation of natural spaces and wildlife has taken a back seat.

Pollution from the site will likely be of light and noise forms, and these will over reach far beyond the boundaries of the development site itself. While also damaging the quiet and dark nature of the village as a whole, in a broader sense it will drive away swathes of fauna that need these aspects to thrive. Established nocturnal species of owls and badgers will be effected and driven away. More sensitive creatures such as deer will retreat further into the valley and less often be seen. In all changing the natural character of the area irreversibly.

It goes without saying that the majority of these changes will be permanent in nature. Of course there will be some recovery from more bold species of flora and fauna that can adapt to overcome the changes but there are many that will not and will move away indefinitely. All forms of pollution will increase, as is expected with an increase in population, and this will also be a permanent change.
Economically there will be very little net gain, those that are shopping at the few proposed shops will bring very little money to the area and the majority will still look elsewhere to more well stocked areas in Aldershot and Guildford for their groceries and day to day supplies.

As with any increase in population there will also be an increase in crime, a statistic that is highly correlated and can be avoided by relocation of the development to places with a less established community and local area.

In closing, such infilling developments and especially that which has been proposed at Normandy village are inappropriate and inadequate solutions to housing around the Guildford area. Any sentiments that I have expressed are not of the NIMBY (not in my back yard) disposition, but are of hard facts that will definitively change the character of the village for the worse, and will remove sites of such appeal and nature from the surrey hills area forever. It is not in the locals’ best interests to have such a site be constructed in the heart of our village and overtake the village as it is with its scale. It would be much more sensitive to the local area to develop along roads and byways, and to let any development happen naturally, rather than setting down what is essentially a whole new village within the existing one. I urge that this development be halted in its current state and searches be made for sites of more suitable character. I understand the need for housing in a growing population but this planning application grossly oversteps what is necessary and should be reconsidered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/739  Respondent: 15280321 / Sport England (Owen Neal)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Draft Infrastructure Delivery Plan

The Council does not have an up-to-date assessment of the need for open space, sports and recreation facilities required by paragraph 73 of the NPPF. Sport England considers that additional work is required to determine what additional indoor and outdoor sports facilities are required in the Borough and this should inform the Infrastructure Schedule.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1221  Respondent: 15280321 / Sport England (Owen Neal)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
It is Sport England’s policy to resist proposals which will result in the loss of a playing field, unless it meets one of five exceptions as defined in A Sporting Future for the Playing Fields of England, see: https://www.sportengland.org/facilities-planning/planning-for-sport/development-management/planning-applications/playing-field-land/  

Sport England’s policy is supported by paragraph 74 of the Government’s National Planning Policy Framework (NPPF). Both Sport England’s policy and paragraph 74 also support the protection and retention of other sports facilities. In light of this, Sport England’s main consideration in relation to site allocations is to seek to protect existing playing field stock and sports facilities being lost to development. Please note that if any such sites are being considered for inclusion within the Plan, please could the Council consider their allocation within the context of our Policies referenced above  

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID</th>
<th>Respondent</th>
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<tr>
<td>PSLPP16/2397</td>
<td>15280321 / Sport England (Owen Neal)</td>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6</td>
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Sport England welcomes the council’s objective of increasing the contribution that tourism, arts, cultural heritage and sport make to their local community’s quality of life, social and cultural well being.  

Further, Sport England supports the policy which protects against the loss of indoor sports venues unless replacement facilities of equivalent or better standard and provision is proposed in a location accessible to the facility’s current catchment area; or robust evidence demonstrates that the facility causes significant detriment to the amenity of the locality or that:  

- there is no longer a need for the existing facility or an alternative leisure or visitor use; and  
- the existing use is unviable and its retention has been fully explored (including through marketing the facility for alternative leisure or visitor use for a continued period of at least 18 months).  

Sport England would like to see outdoor sports facilities specifically covered within Policy E6 or have a separate policy. Outdoor sports facilities and indoor sports facilities are given equal protection from development under paragraph 74 of the National Planning Policy Framework. The current phrasing of Policy E6 which applies to “existing leisure attractions” is ambiguous and further clarity should be provided. Sport England therefore objects to Policy E6.  

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>PSLPP16/2401</td>
<td>15280321 / Sport England (Owen Neal)</td>
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Sport England supports that the Council’s intention to protect existing outdoor sports facilities in accordance with the National Planning Policy Framework within Policy I4.

However, Sport England recommends that a separate policy or reference is required within the Green and Blue Infrastructure policy to cover outdoor and indoor sports facilities. This is because where it is proposed that these facilities are lost to make way for other forms of development, the reprovision of sports infrastructure can be more complex than it is for some other forms of green infrastructure. In seeking to protect sport facilities Sport England will refer to our Playing Fields Policy – Planning Policy Statement: A Sporting Future for the Playing Fields of England see:

https://www.sportengland.org/facilities-planning/planning-for-sport/development-management/planning-applications/

Our Playing Fields Policy reflects the wording of Section 74 (see Exception 4 and 5).

Sport England also considers that the Council should do additional work to plan for new sports facilities in line with the guidance in Paragraph 73 of the NPPF which states:

“Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The assessments should identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. Information gained from the assessments should be used to determine what open space, sports and recreational provision is required.”

Without a robust assessment of need in place in the form of an up-to-date PPS, there is no evidence that new leisure, recreational and cultural facilities are required. Therefore, whilst Sport England supports the provision of new facilities, there is a risk that any policy may be open to challenge and deemed unsound on the basis that it is not fully justified.

With regards to the provision of new infrastructure and facilities, Sport England would require a contribution to both sports pitches and the built provision of sports facilities to meet the increased demand caused by the additional population. Sport England’s Sports Facilities Calculator (SFC) is a very sophisticated planning tool which helps to estimate the level of demand for key community sports facilities that is created by a given population. The SFC has been created by Sport England to help local planning authorities quantify how much additional demand for the key community sports facilities (swimming pools, sports halls and synthetic turf pitches), is generated by populations of new growth, development and regeneration areas. It uses information Sport England has gathered on who uses facilities and applies this to the actual population profile of the local area. This ensures that the calculation is sensitive to the needs of the people who actually live there. Further information on the SFC can be found on our website at:

http://www.sportengland.org/facilities_planning/planning_tools_and_guidance/sports_facility_calculator.aspx

Sport England’s Planning Policy Objective 8 ‘Providing for Sport through New Development’:

“To promote the use of planning obligations as a way of securing the provision of new or enhanced places for sport and a contribution towards their future maintenance, to meet the needs arising from new development. ”

Again, these facilities should include existing open space, sports and recreational building and land as stated within paragraph 74 of the NPPF. However, without a robust assessment of need in place in the form of an up-to-date PPS which clearly identifies shortfalls in provision, there is a risk that this policy could not be justified and deemed unsound. Further,
without such an up to date strategy, it would be difficult to determine specific proposals through the development management process in line with the council’s local policy. Sport England therefore objects to Policy 14.

Sport England support the view on the dual use of sites, in particular the extended use of school sites for the benefit of the community. Sport England has developed a toolkit regarding accessing schools for community use which may be of use, available via the below link:

http://www.sportengland.org/support_advice/opening_schools.aspx

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/560  Respondent: 15280321 / Sport England (Owen Neal)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

Sport England has an established role within the planning system which includes providing advice and guidance on all relevant areas of national, regional and local policy as well as supporting local authorities in developing the evidence base for sport.

Sport England aims to ensure positive planning for sport, enabling the right facilities to be provided in the right places, based on robust and up-to-date assessments of need for all levels of sport and all sectors of the community. To achieve this our planning objectives are to seek to PROTECT sports facilities from loss as a result of redevelopment; to ENHANCE existing facilities through improving their quality, accessibility and management; and to PROVIDE new facilities that are fit for purpose to meet demands for participation now and in the future.

We work with the planning system to achieve these aims and objectives, seeking to ensure that they are reflected in local planning policies, and applied in development management. Please see our website for more advice:

http://www.sportengland.org/facilities-planning/planning-for-sport/

Evidence Base

The National Planning Policy Framework (NPPF) requires each local planning authority to produce a Local Plan for its area. Local Plans should address the spatial implications of economic, social and environmental change. Local Plans should be based on an adequate, up-to-date and relevant evidence base. In addition, para 73 of the NPPF requires that:

“Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The assessment should identify specific needs and quantitative deficits or surpluses of open space, sports and recreational facilities in the local area.”

Sport England is aware that the Council does not have an up-to-date Playing Pitch Strategy or indoor or outdoor sports facilities strategy. It is noted that the Council relies on an open space, sport and recreation assessment based on the out-of-date “PPG17 – planning for open space, sport and recreation” and does not include a Playing Pitch Strategy. It is noted that there is little detail on sports provision within the assessment and indoor sports facilities are not included. It is crucial that the Council has an up-to-date and robust evidence base in order to plan for the provision of sport both playing fields and
built facilities. Sport England would highly recommend that the Council undertake a playing pitch strategy (PPS) as well as assessing the needs and opportunities for sporting provision. Sport England provides comprehensive guidance on how to undertake both pieces of work.

**Playing Pitch Strategy**


This guidance document provides a recommended step by step approach to developing and delivering a playing pitch strategy (PPS). It covers both natural and artificial grass pitches. Sport England believes that to ensure there is a good supply of high quality playing pitches and playing fields to meet the sporting needs of local communities, all local authorities should have an up to date PPS. By providing valuable evidence and direction a PPS can be of significant benefit to a wide variety of parties and agendas.

**Assessing needs and opportunity for sports provision (Indoor and Outdoor)**


This guide complements the PPS guidance providing the recommended approach for assessing the need for pitch provision. Sport England believes that providing the right facilities in the right place is central to enabling people to play sport and maintain and grow participation. An assessment of need will provide a clear understanding of what is required in an area, providing a sound basis on which to develop policy, and make informed decisions for sports development and investment in facilities.

Without this additional evidence base, Sport England is concerned that the Council has not adequately planned for indoor and outdoor sports facilities in accordance with paragraph 73 of the NPPF. On this basis, Sport England does not agree that the evidence used is adequate, up-to-date and relevant.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/561</th>
<th>Respondent: 15280385 / Alexander Chenery</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): (Yes)</strong></td>
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I believe the local plan fails to take any material consideration of (1) the impact on the proposed Guildford Town Centre plan on local residents who live within that zone, (2) the existing infrastructure (specifically, parking) difficulties and problems faced by local residents based on current developments in the Town Centre and surrounding areas, and (3) the significant impact that future developments in and outside of the Town Centre will have on residents in the Guildford Town Centre area, specifically in relation to parking.

In particular, whilst at various points the local plan notes that the increased housing developments will result in a greater demand for the amenities in Guildford Town Centre and that a number of these developments will not be within walking
distance of the Town Centre for many, a number of the development sites would directly result in the removal of car parks and parking spaces. This is totally illogical. There is no thought or consideration given to what happens to cars using these existing parking facilities, or the impact that this would have on residents, who already suffer great misery on the weekends having to use congested dual-use parking bays. Although reference is made Guildford's Transport Plan 2016 and that further consideration will be given to any necessary changes, it is naïve and ill-conceived to believe that significant infrastructure plans can, or should, be formulated without also reviewing the local transport plan. This is both in the interests of local residents and local businesses, who quite understandably want visitors to having adequate parking provision to ensure that Guildford remains a principal retail centre.

I also believe that the local plan fails to take any adequate consideration of the wider catchment area that Guildford has - the report and the evidence base is very insular facing and fails to consider the wider catchment area that Guildford has across Surrey and surrounding counties for shopping and other amenities. It fails to consider that this wider catchment means that cars and parking issues will continue to exacerbated by increased infrastructure development and it is totally misplaced to assume that alternative transport links (such as park and ride (which the local plan seems to place great hope on, but this is totally misplaced and it is quite clear this is not a substitute for car parks) or buses (which, again, the local plan seems to put great hope on, but it is quite clearly not a substitute for car parks given the long distance catchment that Guildford has)) will be adequate to support the increased population who will consider Guildford to be their nearest shopping centre.

The absence of any consideration of the impact on Town Centre parking, and in particular the parking arrangements for residents who already have to put up with congested roads, a lacking of dedicated parking spaces for residents and poor parking behaviour by visitors, means that I do not believe that the plan fails to take account of the interests of all of its stakeholders and I think that the local plan is deficient in this respect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
Having attended the meeting of SCC’s Planning and Regulatory Committee on 25th March 2015 when the decision was made to grant planning permission (for the construction of new 2 storey teaching block comprising 8 classrooms and extension to existing school hall following removal of two existing modular buildings; extension of playground onto existing parking area and provision of new car park) we noted that the officer’s report to the committee made reference to the objections received from local residents: “mainly on grounds of the effects of the additional traffic generated by the development exacerbating current problems of congestion and on-street parking”.

We are aware that whilst officers considered the highways / transport impact of the proposal could be mitigated through the imposition of conditions – including the School Travel Plan – Councillors asked for an informative to be added to the decision notice, formally noting that consideration is given to the provision of a controlled pedestrian crossing on the A323 Aldershot Road at Fairlands, and making clear that they support the ongoing investigation and development of this project as a potential contributor to reducing school-related traffic in the area. Securing a crossing across the A323 is also a key objective / target of the proposed Travel Plan.

We also note the Planning and Regulatory Committee’s decision, on 10th December 2014, to defer consideration of the school’s application due to one of the then proposed traffic mitigation measures no longer being available. At a subsequent meeting on 7th January 2015 between representatives of Worplesdon Parish Council (WPC), the Fairlands, Liddington Hall and Gravetts Lane Community Association (FLGCA), SCC (Highways, Planning and Property) and Cllr Keith Witham (SCC) alternative mitigation options were discussed. At this meeting it was agreed that a number of possible mitigation options should be investigated. A “Report on Traffic Mitigation Measures” was then prepared which formed part of the background papers to the subsequent decision to grant planning permission.

As the report to the committee on 25th March 2015 set out, one of the potential options was “a new vehicular access from Aldershot Road to the school via Hunts Farm or Hook Farm”, however, the aforementioned Report on Traffic Mitigation Measures made clear that, “SCC is not in control of the land adjacent to FP 447 in order for this to be developed into a road”. The report went on to confirm that:

“N.B. During this investigation SCC Property has been made aware of a potential future residential development on the property south of the school that could provide alternative access. However, this project / land is out of our control and is too early in the viability stages to be considered as a feasible mitigation measure for this school expansion.”

Consequently, it concluded that neither this nor other options to mitigate the potential increase in traffic arising from the proposed school development “are considered viable at this time”. Accordingly, paragraph 68 of the officer’s report stated that there is “little that can be realistically and reasonably done” due to “the isolated position of Fairlands”. This is despite acknowledging that the existing number of pupils at the school currently causes localised difficulties on the highway network at drop-off and pick-up times and that it is also clear that the increase in enrolment by 120 children would exacerbate the current situation. Nevertheless, the officers concluded that the school has been proactive in addressing the issues of traffic congestion and parking, especially in the preparation of the School Travel Plan and involvement with the Living Streets Programme, but there remain unresolved issues which still require a long-term solution.

Our proposals and their alignment with the School Travel Plan

In light of all the above, and the continuing local concerns about the impact of the school’s expansion on the existing Fairlands community, we consider that our proposals for a development at Hook Farm and Hunts Farm represent the only realistic prospect of addressing the objectives / targets in the School Travel Plan (including the informative agreed by Councillors last March) and delivering the main Traffic Mitigation Measures as set out in the report requested by WPC, FLGCA and Cllr Witham in January 2015. Given that the school (which was originally intended to accommodate 240 pupils) is increasing from 420 to 450 this coming September, with further uplifts to 540 in the coming years, the need for such measures to be implemented is ever more pressing.

As you will be aware, Guildford Borough Council (GBC) is currently preparing the next iteration of its Local Plan, ahead of a Regulation 19 consultation in June. To aid the Council’s deliberations on site allocations, we (Miller Developments) have submitted a detailed brochure for their consideration, in support of our proposals for land at Hook Farm and Hunts Farm. As this document sets out, our plans offer a unique opportunity to solve the congestion issues within Fairlands at school drop off and pickup times.
In preparing this submission, we have spoken with the School’s Headteacher, Alistair Parsons, who is also the author of the School Travel Plan. We support his endeavours to implement the plan and particularly wish to assist him in progressing Objectives 4, 5 and 6, and Target 5 relating to the delivery of these objectives. These objectives and our corresponding proposals are set out below.

<table>
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<tr>
<th>Travel Plan Objective</th>
<th>Our Proposal</th>
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<tr>
<td>Open discussions with Surrey County Council or relevant planning authority for a crossing to be provided across the A323 to enable families to safely cross the A323 and enable walking and cycling to school from the Rydes Hill, Stoughton and Queen Elizabeth Park areas.</td>
<td>Our brochure explains how a new traffic light controlled junction on the A323 Aldershot Road at Gravetts Lane could provide an alternative access to the school, offering a safer environment for pedestrians and cyclists with dedicated crossing points. Vehicle speeds along the Aldershot Road would also be reduced to the benefit of highway safety. We are in discussion with SCC Highways about these proposals.</td>
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<tr>
<td>Increase the amount of parents, pupils and staff travelling sustainably on the journey to / from school is increased.</td>
<td>This would be achieved as a result of the vastly improved pedestrian, cycle and vehicular routes that would be enabled by our development, including the new direct access route between the A323 Aldershot Road and the Primary School (see paragraph 13 below) which would allow for separate, safe use by motorists and non-motorists alike.</td>
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<tr>
<td>Open discussions with Surrey County Council or relevant planning authority for an all year round usable Pathway to be built between Wood Street Village and Fairlands Estate to allow families to cycle or walk between the two communities and to support the increased numbers of families travelling from Wood Street Village to Fairlands.</td>
<td>Our brochure sets out a willingness to deliver the objective for an all year round route (for cyclists and pedestrians) from Wood Street Village utilising the existing footpath that runs south to north between Hook Farm and Hunts Farm to Fairlands / the Primary School.</td>
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Target 5 of the School Travel Plan states:

“Contact Surrey County Council or relevant planning authority to discuss; installing time plates for the school Zig Zag lines, a crossing over the A323, a permanent pathway between Wood Street Village and Fairlands, regular maintenance of pathways and vegetation along the A323 by October 2016.”

We would be pleased to work constructively with the school (and SCC as the education authority) in helping to achieve this target. As paragraph 16 below makes clear, our development would enable the funding for these significant improvements, at no cost to SCC.

**Meeting the aspirations of the Report on Traffic Mitigation Measures**

With our proposal for a new vehicular access from Aldershot Road, across Broad Street Common, we can exceed the objectives of the School Travel Plan and put in place a long-term sustainable solution in line with the aspirations of the Report on Traffic Mitigation Measures; thereby addressing the concerns of WPC, FLGCA and others.

As the proposed new access road would require the use of land which is currently designated as Common Land, we are in active dialogue with SCC officers about this. Whilst SCC previously advised that such mitigation was not deliverable as they did not control the required privately owned land, we would ask that this opportunity is now revisited as we are prepared to make the adjacent land available for this purpose.

**A long-term alternative to parking restrictions**

On a related matter, we are aware that on 8th December 2015 the Guildford Local Committee considered proposals for a Parking Order to mitigate the effect of school traffic on a number of roads in Fairlands, but chose to defer making a decision until 23rd March 2016 “to allow for further discussions with local borough and county councillors and other interested parties”. We understand that whilst there are mixed views locally about the desirability of such parking orders
being put in place, they are likely to be agreed next month given the increase in pupil numbers at the school this coming September. Therefore, whilst the Parking Order may be a short term answer, a better solution would result from the new access arrangements proposed as part of our development. Such an approach would allow the parking restrictions to be subsequently removed, thereby addressing the concerns of those residents who do not wish to see them put in place.

The way forward

We support the proposed School Travel Plan and would ask that SCC approves it as the relevant planning authority. However, it is clear from our recent discussions that there is no standalone funding available to support the significant measures which are required, and therefore the only realistic prospect of delivering (and exceeding) the Plan’s objectives would be by supporting a residential development at Hook Farm and Hunts Farm (with the highway improvements being funded via a Section 106 agreement required as part of the conditional permission).

Given that our proposed development would offer such significant local benefits (as outlined above) which align with the objectives of SCC, the Primary School, WPC, FLGCA and local residents, we are asking Guildford Borough Council to take these into account when reviewing which sites should be allocated for residential development in the Local Plan. We are aware of a number of sites in the Worplesdon parish (and elsewhere in the Borough) being promoted for residential development, but none of them offer the scale of highway and community benefits associated with our proposals.

In light of all the above, we would ask that the applicant (SCC), in seeking approval for the School Travel Plan, makes representations directly to GBC setting out how the objectives of the Plan could be enabled through the allocation of Hook Farm and Hunts Farm for residential development. As GBC intends to publish its draft consultation document on the proposed Local Plan in April, there is limited time available to promote the benefits that would flow from this potential allocation.

I will arrange for a copy of our brochure (setting out more details of our plans) to be forwarded to you in the near future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

- Submission by Miller Developments on SCC Ref 2016-0005 - Worplesdon Primary School Travel Plan - final.pdf (488 KB)
- Letter from Headteacher of Worplesdon Primary School - Miller Developments.docx (1.3 MB)
In introducing the site allocations, the Plan confirms that the objective is to bring forward housing sites in the earlier stages of the plan period, to help boost housing supply. It is acknowledged also that those sites that are constrained and are identified to come forward in later years should be encouraged to come forward sooner.

Miller is challenging the spatial strategy and its over reliance on larger strategic housing allocations (those over 1000 dwellings) on the basis that they are dependent upon the provision of infrastructure, especially highway improvements, which are yet to be specified, costed or accurately programmed for delivery.

The RIS programme makes reference to ‘anticipated’ start dates and in the absence of detailed designs developers cannot assess the additional capacity these improvements will create, when they will come forward or how much they will cost. Hence developers will be wholly dependent upon the existing highways network for access; which is already near, or at its design capacity and arguably in some cases exceeds capacity. The improvements that will be of greatest benefit to the larger strategic sites are the improvements to the A3 between Guildford and the A31 Hogs Back junction and these are not ‘anticipated’ to ‘commence’ until the latter end of the plan period (post 2024). Furthermore, developers have no detailed understanding of the proposed Sustainable Movement Corridor improvements; in particular its timing or cost. These unknowns will add uncertainty about the viability and deliverability of these major developments.

In relation to the identification of potential housing allocations the Council has had regard to a number of studies which have in turn informed the GBCS and its most recent review (Volume V).

The original study (which as originally published in 2014) ultimately identified a number of Potential Development Areas (PDAs) that could potentially be released for development, should it be necessary to release Green Belt sites in order to meet housing demands. The Study assessed the PDAs against the main purposes of the Green Belt and went on to assess their sustainability credentials and environmental capacity. The Study findings informed the Council’s Strategy & Sites document which was published for consultation in 2014 and set out the Spatial Strategy for the Borough (distribution of development sites). This version of the Plan concentrated on opportunities beyond the Green Belt to the west of the Borough; the extension of Guildford’s built up area and the countryside around villages. However, it did not include details of the Council’s highways strategy.

Subsequently, the Council commissioned an extension of the GBCS which was published in February 2016. This additional work considered whether other development opportunities might exist in areas excluded from consideration at the time of the original study, notably:

- Use countryside to expand around settlements located in adjoining boroughs;
- Use countryside to expand around settlements located in the AONB;
- Assess the potential to inset additional villages depending on the development of PDAs;
- Further assessment of Countryside beyond the Green Belt (CBGB);
- Expansion or redevelopment of previously developed sites;
- Significantly expand a village. In this regard, it is to be noted that the Council’s brief to the prospective consultant stated that:

“An initial assessment based on previous consultation, desktop research and our settlement hierarchy suggests that areas with greatest potential include the countryside, such as land between the villages of Normandy and Flexford or Send and Send Marsh / Burnt Common *. Significantly expanding or merging villages would utilise more effectively the services and facilities that are already present there whilst at the same time be of sufficient scale to enable
additional supporting infrastructure. The study should assess these and other similar opportunities across the borough.”

• Create a new village.

* Surprisingly the Council did not include the village of Fairlands in this shortlist despite it scoring better in sustainability terms than sites around Send and Normandy / Flexford. This is returned to below.

This additional GCBS volume has very much been used to justify the latest iteration of the Council’s Spatial Strategy and, in particular, the inclusion of the Wisley Airfield site and the introduction of a further strategic site at Normandy / Flexford, which (along with the other strategic sites) are considered to meet the newly introduced ‘critical mass’ criteria; an arbitrary scale of development that is deemed necessary to support the level of infrastructure necessary to support the larger sites.

This new criterion requires that, in order to represent a sustainable development, as required by the NPPF, large expansions to existing villages, or an entirely new village, should result in a settlement that benefits from:

• A mix of uses, including residential, employment, community and retail;
• A critical mass of population to support the above uses, likely to be at least 4,000;
• A significant proportion of open space (40%); and
• Connections to the wider public transport network.

Furthermore, the Council has adopted the following assumptions when assessing the credentials of competing sites:

• Residential development should make up approximately 50% of the land take area of the identified PMDA. The residential land take would be calculated on the basis of 30 dwellings per hectare with an average household size of 2.4 people to determine the population growth at the village;
• Open space should make up approximately 40% of the land take area in accordance with new settlement guidelines. This can include Suitable Alternative Natural Greenspace (SANG) and public open space within the PMDA; and
• Village infrastructure such as roads and attenuation ponds together with other additional facilities including employment and a local centre with shops, food and drink outlets, primary school and nursery, would make up approximately 10% of the land take area depending on which facilities are applicable to the major expansion. If the village expansion does not include certain facilities due to scale, other uses such as housing may have increased capacity within the PMDA.

Whilst these criteria may well have been derived from a successful development elsewhere in the country, Miller considers that the characteristics of Guildford Borough and the development constraints that exist do not warrant such a prescriptive approach to assessing the development potential of major sites. To the contrary, it seems to be a post-justification of the Council’s strategy to concentrate the majority of its housing requirements on a limited number of large sites and avoid sensitive decisions that would surround a greater number of smaller Green Belt releases; despite the fact that such sites would place less of a burden on infrastructure during the early periods of the plan if properly distributed.

We therefore believe that the Guildford Borough would be far better served by a more flexible approach that enabled a greater number of modestly sized sites, properly distributed across the borough – on a scale that was put forward in earlier iterations of the Local Plan. Whilst some of the strategic sites have their attributes, they can only realistically be partially developed during the Plan period (subject to wider infrastructure provision), so alternatives do need to be developed. This is particularly the case when taking into account the widespread concerns about the Normandy / Flexford site (and the doubts over whether the proposed secondary school is actually needed) and the likely AONB restrictions in relation to the Blackwell Farm site.

Miller’s concerns are exacerbated by the Council’s conclusion that:

‘No major village expansions were considered appropriate within the surroundings of Chilworth, East Horsley, Fairlands, Pirbright, Ripley, Shalford and Wood Street Village due to a combination of environmental constraints, limited sustainability credentials, and the potential impact on the purposes and openness of the Green Belt within Guildford Borough’ and, as a consequence, deleted the references to any PDAs / Safeguarded land in these locations.’
This conclusion is entirely inconsistent with the original findings of the GBCS which concluded that, for example, H8-C was a highly sustainable location and could be developed without compromising the purposes of the Green Belt. The Council has provided no justification for the U-turn.

In light of Miller’s concerns it is considered that the Plan should identify a number of more modestly sized sites (such as H8-C) across the borough as a whole, as an alternative and / or in addition to relying almost exclusively on the larger allocations.

Whilst some of the strategic sites clearly have their attributes, they can only realistically be partially developed during the Plan period, so others sites will need to come forward, especially given our concerns about Normandy and Blackwell Farm – as we go on to outline in more detail in our specific concerns about these allocations.

In this context, Miller is particularly concerned about the Council’s failure to properly review the potential of the site H8-C in the most recent review of the GBCS; a site which is considered to represent a highly sustainable opportunity adjacent to an existing village. This concern is heightened by the fact that H8-C is considered to be far more sustainable that the newly allocated PDA at Normandy / Flexford and shares many characteristics considered to justify the allocation.

Overall, Miller considers that:

- Too great an emphasis has been attached on the conclusion reached that Parcel H8 is of ‘High Sensitivity’ in Green Belt terms. This is a large land parcel which includes Fairlands village to the north east and Wood Street Village to the South West. The area between comprises agricultural land which is crossed by numerous tree lined public rights of way and is characterised by well-established tree belts that define field boundaries, meaning that the majority of it is not even being considered for development, nor would ever be likely to be so. The original GBCS concluded that these defensible boundaries supported the development potential of PDA H8 (which is a much smaller area to the area H8) ‘without compromising the purposes of the Green Belt’.

- In summary, it was considered that Fairlands could be ‘inset’ as the village contributed little to the openness of the Green Belt and that the PDA could effectively be removed from the Green Belt without compromise to its purpose (with the purpose being maintained by the significant remainder of the H8 area). In other words, it was felt that the ‘openness’ of the area would be maintained by developing within the well-defined field boundaries and that the gap between Fairlands and Wood Street would be maintained thus preventing the settlements form merging. The maintenance of this gap would also preserve the setting of Wood Street (a historic village and Conservation Area) which lies some distance to the south west.

- Too little weight has been applied to the sustainability credentials of the land adjoining Fairlands which scored highly in the original GBCS; especially in respect of H8-C (our site). As confirmed in the recently published Volume V to the GBCS the PDAs for Fairlands came 6th in the overall Sustainability Rankings (with parcel H8-C ranking particularly highly) which compares equally, if not better, to the assessments for Send (5th in the Sustainability Rankings), Send Marsh / Burntwood Common (20th) and Normandy / Flexford (10th); all of which the Council has now concluded can be brought forward for development.

Accordingly, there seems to be no reasoned justification why Fairlands should not also be considered as an appropriate location for development as has been consistently maintained by Miller in relation to H8-C in circumstances where the site:

1. Would provide for a level of development that respects the character of – and be subservient to – the existing village.
2. It would not necessitate access through the village which is already constrained by the narrow road layout, on street parking, the left in left out access junction on the A322 and the school traffic that causes congestion during the AM and PM peak periods.
3. The site would provide access to the school from the south which would remove school traffic from the village, particularly as the school continues to expand its pupil numbers over the coming years.
4. The new access would provide safe pedestrian and cycle routes and highway improvements to the A322 including a new pedestrian crossing to enhance access to the school, in line with the objectives of the recently approved School Travel Plan.
5. The scale of development can be accommodated with improvements to the foul sewers, an upgrade of the electrical power and the new access. These improvements are of a level that would not constrain the ability to deliver a policy compliant level of affordable housing.
6. Any minor loss of common land can be compensated for and the development can provide on-site public amenity space which links via existing and proposed footpaths to the immediately adjacent common.

7. The purposes for designating the Green Belt would be largely unharmed as the site is well screened by existing mature tree and hedgerow boundaries that will preserve the openness of the wider Green Belt. For the reasons set out above the other purposes of the Green Belt would be maintained.

In shaping the proposals, Miller has engaged with the local councillors, the Parish Council, the school community and local residents to identify how a development at Hook Farm / Hunts Farm could most effectively complement the local area. Given the considerable emphasis that has been placed on justifying the need for the strategic allocation at Normandy / Flexford based on the supposed need for a new secondary school in that location, we consider that the actual need in relation to an existing primary school for a long-term access solution should be given significant weight in deciding whether the land at Hook Farm / Hunts Farm is allocated to enable this. To support the case for this, and to expand on the points set out above, we are appended to this submission a number of documents, including a:

- Submission by Miller Developments in relation to Worplesdon Primary School’s Travel Plan (which although now approved has no deliverable actions to address the issues relating to increasing school traffic).
- Letter from the Headteacher of Worplesdon Primary School to parents setting out that the School welcomes our initiative in offering a proper solution to the traffic and parking issues faced on a daily basis.

During March, we undertook a series of consultation sessions with parents and local residents, at which the attached presentation boards outlining Miller’s proposals for the land at Hook Farm / Hunts Farm. These boards provide further details of the unique benefits arising from a residential development in this location, and how key issues would addressed.

The consultation feedback can be summarised as follows:

**Parents:**

- Strong preference for improved access arrangements to Primary School, as well as a safer crossing across Aldershot Road.
- Support for pathway footpath between the School and Wood Street Village which would be drained and capable of use all year round; with an indication given that more parents would walk / cycle their children to school.
- Recognition that existing access to the School causes problems for local residents and they would like to see an alternative in place which does not involve passing through Fairlands Village.
- Concern as to whether the proposed car park is large enough; request for a larger number of spaces to be provided.
- Recognition that additional housing is needed in the local area, with this location considered preferential due to wider benefits it brings.

**Public – general feedback:**

- Overwhelming recognition of the need for additional housing in Guildford Borough.
- Mixed views on Guildford Borough Council’s stance that some Green Belt land must be released for development.
- Strong preference for Hook Farm / Hunts Farm instead of the then safeguarded land to west of Fairlands (H8A & B).
- Strong support for proposed new access road, safe crossing and pathway to Primary School.
- Mixed views about the proposed use of Common Land for the new access road, with a strong desire to see lost land re-provided.
- With regard to a number of technical issues which were also raised, these would be addressed at the application stage.

Like many other sites around the Borough, vehicular access would be enabled through the creation of a new road across publicly-owned land – in this instance Common Land between the A323 and the development site. Miller is currently engaged in a constructive dialogue with Surrey County Council’s Estates Department about the purchase of the necessary land for widening the existing access, with any minor areas of Common Land lost being reprovided in full.
For the above reasons Miller maintains that Site H8-C (which comprises of land at Hook Farm / Hunts Farm) should be allocated for development which would ensure housing coming forward during the early part of the Plan period and reduce the risks associated with relying on the larger housing allocations which are infrastructure dependent which could affect their viability and delivery.

As outlined above, Miller does not support the assumption that to be sustainable village expansion or any new settlement must have a population of 4000. A development with a population of around 550-600 is clearly sustainable (and on a scale that is more in keeping with the character of most of the Borough) given that significantly smaller developments have been allocated within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
- 15057_Boards_FINAL_LR.pdf (9.6 MB)
- Submission by Miller Developments on SCC Ref 2016-0005 - Worplesdon Primary School Travel Plan - final.pdf (486 KB)
- Letter from Headteacher of Worplesdon Primary School - Miller Developments.docx (1.3 MB)

Comment ID: PSLPS16/1260  Respondent: 15280737 / Miller Developments (David Milloy)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A24

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Whilst the original intention was to access this site via a new road from Clay Lane to the east; this option is no longer being pursued. The intention is now to access the site from the A320 Woking Road. This road is a principal route into Guildford which also serves the Slyfield industrial area and Jacobs Well. The Woking Road experiences significant congestion and not just at peak periods on the network.

The necessary highways infrastructure required to serve this site necessitates the developer providing the on-site section of the Sustainable Movement Corridor (SMC) and a proportionate contribution to the northern section of the SMC along the Woking Road. The details of the SMC are still to be confirmed and costed and could be frustrated by certain pinch points along the Woking Road, notably where the road crosses the Canal, the Bellfields roundabout and the roundabout serving the A3 north bound on-slip. To provide bus priority through these pinch points and through the A320/A25 junction will require significant widening and bridging.

The development is also required to provide a new sewage treatment works, flood mitigation and betterment and the relocation of the waste management depot.

The funding of the infrastructure improvements and the timing of delivery is still to be confirmed, as is the cost of re-provision of existing on site facilities. As a result of these uncertainties Miller is concerned about the viability of this development and its ability to deliver any significant level of affordable housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/1261  
Respondent: 15280737 / Miller Developments (David Milloy)  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The site is on the principal gateway to Guildford and is considered to be of Medium Sensitivity in Green Belt terms; which Miller considers surprising as although the site may not prevent settlements from merging or assist in preserving the historic character of Guildford, it is an extremely prominent site which sits above the datum of the road and is therefore considered important in terms of the ‘openness’ of the Green Belt. The site also lies to the west of an area of significant woodland and to the north of Clandon Park, a registered park and gardens. Combined these factors would suggest the site should be classified as being of High Sensitivity in Green Belt terms and that the use of the ‘four purposes’ alone is unrepresentative of the sites contribution to the Green Belt.

This development will provide for over 2,000 dwellings, a potential 1,000 space Park & Ride site, a two-form primary school, a four-form entry secondary school and employment and community floor space, all of which are high traffic generating uses which means that the allocation is highly dependent upon strategic infrastructure improvements which, as the Council acknowledges, may require the development to be phased in line with infrastructure delivery.

The site is proposed to be served by a new southbound off and south bound on slip to the A3 and improvements to the local network along the A3100. However, the Plan refers also to the potential for a new all movements junction on the A3 which would potentially reduce the net developable area of the site.

Miller considers that with no all movements junction the development could have an unacceptable impact on the local highway network through Burpham; which is already at capacity.Whilst the Plan suggests that development might be phased to allow for major infrastructure improvements to be delivered first, Miller is of the view that no development can realistically take place on this site until the local network has been improved and, if required, the SMC proposals implemented. Lesser levels of mitigation would be unlikely to prove adequate given existing pressures.

In circumstances where the infrastructure improvements are yet to be confirmed it is not known how the developer can assess the cost implications which could place a very significant burden on the viability of the scheme and the timing of delivery. Miller is concerned that these requirements could significantly hinder the Council’s ability to rely on this development being delivered within the plan period or provide the level of affordable housing envisaged (40%) In addition the number of dwellings proposed could reduce if the developable area is reduced due to the requirements of an all movements junction on the A3.

The cumulative effect of a shortfall in housing from this site and the other major allocations further increases the risks associated with relying on these strategic sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1263  
Respondent: 15280737 / Miller Developments (David Milloy)  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
The northern part of this site allocation is considered to be an area of medium sensitivity in Green Belt terms with the southern part of the site (adjacent to the A3) considered to be of High Sensitivity. Whilst the main part of the site might only satisfy two of the ‘four purposes’ that support the inclusion of land within the Green Belt such an assessment ignores the very significant contribution the site makes to the ‘openness’ of the Green Belt and the fact that this area defines the rural boundary to the west of Guildford. In addition, the site is clearly visible from the higher ground to the south and west which forms part of the Surrey Hills AONB and acts as a buffer between the built up area and this nationally designated landscape. Miller would argue therefore, that the site’s Green Belt sensitivity is in fact far greater that the restricted assessment undertaken in the GBCS suggests.

Indeed, it is noted that a recent independent landscape assessment of the site, undertaken on behalf of the local Parish Councils, suggests that the landscape satisfies the criteria that would justify it inclusion within the AONB. Miller would suggest that the importance of the landscape needs to be determined prior to the confirmation of this allocation; in circumstances where the AONB is national designation where development should only be allowed in ‘exceptional circumstances’.

In addition to the above, Miller is concerned that the site lacks any significant infrastructure and suffers from extremely poor highway access. In particular, Miller would question the suitability of the proposed Down Place access off the A31, which would need to be signalised on an important section of the A31 that already suffers congestion at peak times. However, Miller is of the view that there does not seem to be any other access point from the A31 or A3 due to environmental and physical constraints.

Miller is concerned also about the potential for a ‘secondary’ through rout from the A31 via Gill Avenue, to Egerton Road, to be created to avoid the existing A3/A31 southbound junction. It is considered that this proposed route, which already serves the Science Park, the University Campus and the Royal Surrey County Hospital is already at capacity and would not be able to accommodate any further traffic associated with the additional housing/employment allocation and the new two-form entry primary school; all of which would generate a significant number of peak hour trips.

Miller would question whether the necessary mitigation needed to reduce the impact of the increase in traffic on the local network could be provided in circumstances where over recent years significant improvements have been implemented to the junction of Gill Avenue/Egerton Road yet the network still lack adequate capacity. Furthermore, the constraints in the physical capacity of the local highway network do not seem compatible with the proposed SMC which seeks, in particular to prioritise bus movements.

As with the other major housing allocations Miller considers that the highway infrastructure improvements are a prerequisite of development and that in circumstances where the RIS improvements to the Guildford section of the A3 are not scheduled until late in the plan period very serious doubt remains about not only the suitability of this allocation but about its viability and deliverability.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

| The former airfield at Wisley is identified as a site of Medium Green Belt Sensitivity based on the four purposes of the Green Belt adopted as the assessment criteria in the GBCS. This however down plays the contribution the site makes in terms of ‘openness’ which is one of the principal attributes of any Green Belt. Although the site is considered to be a previously developed site, the quantum of above ground structures on the site is limited and only they currently impact on the site’s openness; the former runways in fact contribute to its open character. As a consequence, the Green Belt designation of the site is significant to the surrounding settlements and when viewed from the A3 and adjacent local roads. Miller would question therefore whether this site should be seen to be of medium Green Belt Sensitivity.  
Whereas RHS Wisley was considered not suitable for insetting due to the contribution it made to the Green Belt (despite the level of development on the RHS site), the opposite conclusion has been reached in relation to Wisley Airfield which is considered to be an appropriate site for a new settlement as it is not part of the Borough that best serves the purposes of the Green Belt. Miller would argue that whilst the site’s development may not constitute ‘urban sprawl’ it clearly and fundamentally represents and incongruous encroachment into the Green Belt and the openness of the countryside. This clearly demonstrates the subjective nature of applying the ‘four purposes’ of the Green Belt as the sole criteria for assessing the impact a potential a development might have on the Green Belt designation is flawed. It is also considered that the impact on the historic setting of Ockham Village and the Conservation Area, due to the separation that exists is inconsistent with how this criterion has been applied elsewhere (e.g. H8 was considered to impact on the Wood Street Village Conservation Area despite the PDAs benefiting from significant separation being maintained). In addition to the above concerns, Miller would question whether taking direct access off the A3 Ockham Interchange off-slip is appropriate. The current Interchange provides for south bound off and north bound movements only and is deemed totally inadequate for a development of the scale proposed. An earlier proposal to serve 2,500 dwellings on this site considered far more significant improvements to the Ockham Interchange would be necessary to accommodate the development and that an all movements junction. It is considered that without an all movements junction even a development of the scale now envisaged will have a significant adverse effect on the character of the villages of Ripley and Ockham. In terms of the sustainability analysis undertaken as part of the GBCS, it is noted that the Wisley Airfield site came near to the bottom of the list yet the Council is suggesting that the sustainability of this location can be be improved by enhancing public transport and cycle access along the existing highways to ‘key’ destinations such as Effingham Junction railway station and Horsley railway station and Ripley. It is unclear as to how these improvements could be achieved without impacting on the character of existing rural roads. Miller considers that whilst the scale of development proposed has a significant critical mass the total lack of any strategic infrastructure and the absence of a workable access solution will add significantly to the cost of delivery of this project and that the improvements to highways infrastructure, which should be delivered in advance of construction (given the highly congested nature of the A3 and A3/M25 junction) will significantly impact on the delivery of housing in this location and any affordable housing contribution.  
What changes (2016)/further amendments (2017) do you suggest should be made to the document?  

| Attached documents: |

| Comment ID:  | PSLPS16/1265 | Respondent:  | 15280737 / Miller Developments (David Milloy) | Agent:  |
| Document:  | Proposed Submission Local Plan: strategy and sites 2016 / Policy A46 |
Do you consider this section of the document; complies with the Duty to Cooperate? (No), is Sound? (No), is Legally Compliant? (No)

Answer (if comment is on questions 1-7 of the questionnaire): ()

The majority of the proposed allocation is considered to be in an area of High Green Belt Sensitivity which (with the exception of the area immediately adjacent to Normandy) scored very poorly in sustainability terms when assessed as part of the GBCS. The area to the north of the railway line, which comprises the majority of the allocation, is considered to be open in character.

It is understood that the Council has included this allocation on the back of a potential new secondary school the location of which is still to be determined. The resolution of Full Council in May 2016 noted that “this site is only included as a strategic site to support the provision of a new secondary school”, before going on to say that “this strategic site allocation be deleted should it be demonstrated that provision of such a school within this site is not required”.

It is unclear why the site was included in the Proposed Submission without first establishing beyond reasonable doubt that a secondary school is actually needed in this location, and securing such a confirmation from SCC as the Education Authority. Indeed, in its last submission to Guildford BC (in 2014), SCC said: “A site within the proposed urban extension at Blackwell Farm, with all necessary access infrastructure built in and a catchment surrounding the site, would be a more sustainable location in transport terms for a new secondary school to serve the western side of Guildford”.

As the supposed need for the secondary school is driving this allocation, it calls into question the whole Local Plan if one of the strategic sites (upon which the Council relies to deliver a sizeable portion of the OAN) is not certain to be taken forward as an allocation. if the site does not come forward the Council will have to go back to the drawing board in order to ensure it has a sufficient number of site allocations to meet the housing requirement over the Plan period.

The proposed site is bordered by an unclassified road (Glaziers Lane D60) on the east, a C-class road (Westwood Lane C16) on the west, and a railway line to the south. Whilst the allocation does benefit from access to Wanborough Station and existing bus routes along the Aldershot Road it is considered that the housing allocation and the seven-form entry secondary school would generate significant levels of private vehicle trips which will require significant improvements to the local highway network and the junctions with the Aldershot Road. It is not known whether any junction improvements with the A31 would be necessary. There are arguably no highway improvements that can conceivably be made to the country lanes surrounding the development to convert them to the A-class roads needed to serve the proposed development. The entry and exit from the A31 ‘Hogs Back’ on to the B3000 to travel to and from the development site via Wanborough Hill would be likely to ‘grid lock’ with the increased volume of traffic to and from the site and the school.

There are also concerns at the failure of the Council to co-operate with other local authorities in respect of this site. In 2013 the development of 3,850 dwellings (population of approx. 9,000) in Aldershot was approved by Rushmoor Borough Council and is situated about 4 miles from Normandy. The development, over a 15 year period, includes two primary schools, and the provision of a SANG and many other provisions. The first phase of 228 dwellings, is now on sale. Guildford BC objected to this development in 2013 (ref: 13/P/00108) on the grounds that insufficient information had been provided to allow a full assessment on the impact of that development on the highways network and said "the impact on Surrey's network and mitigation required has not been established”. The Duty to Cooperate works both ways, and given the objections which Guildford BC raised to the large scale development in Aldershot it is likely that similar concerns could be raised in relation to the proposed large scale development at Normandy / Flexford.

Miller is concerned that should this allocation not come forward the Council’s housing requirement for the plan period could not be achieved. On this basis, the Council has identified no fall-back position, thereby failing to make the Proposed Submission legally compliant.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Respondent: 15280737 / Miller Developments (David Milloy)</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Clearly providing a wide variety of high quality homes that provide all tenures, types and sizes of housing to meet local needs is to be supported as this will go some way towards creating balanced, sustainable and inclusive communities as set out at paragraph 4.2.1. Miller does not seek to challenge the findings of the West Surrey SHMA 2015 in this regard.

Miller does however question whether the Council will be able to secure the proportion of affordable housing identified to meet the needs of the borough’s population (see comments in relation to Policy H2).

Whilst further guidance is awaited in relation to the Government’s ‘Starter Homes’ Policy it is felt that the Plan should make specific reference to the potential provision of starter homes, especially in relation to bringing forward smaller, non-family, units.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

Clearly providing a wide variety of high quality homes that provide all tenures, types and sizes of housing to meet local needs is to be supported as this will go some way towards creating balanced, sustainable and inclusive communities as set out at paragraph 4.2.1. Miller does not seek to challenge the findings of the West Surrey SHMA 2015 in this regard.

Miller does however question whether the Council will be able to secure the proportion of affordable housing identified to meet the needs of the borough’s population (see comments in relation to Policy H2).

Whilst further guidance is awaited in relation to the Government’s ‘Starter Homes’ Policy it is felt that the Plan should make specific reference to the potential provision of starter homes, especially in relation to bringing forward smaller, non-family, units.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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Answer (if comment is on questions 1-7 of the questionnaire): ()

The Council’s policy is dependent upon securing at least 40% affordable provision from development of five or more homes.Whilst it is appreciated that this policy was drawn up after the Government’s 10 dwelling threshold had been successfully challenged, that decision has now been overturned. The policy will need to reflect Government guidance in this regard.

In light of the above the Council’s 40% target will come under increasing pressure, which will be increased by what Miller has identified as an over reliance of the strategic housing allocations.

In this context, the supporting text to the policy suggests that the Council’s viability evidence shows that the vast majority of developments in most locations in the borough are viable and can provide an affordable housing contribution of 40%.

This assertion is questioned. Such assessments are made throughout the country by planning authorities when setting their affordable housing targets, yet they are invariably proved to be wrong with independent viability assessments demonstrating that abnormal costs far exceed what was originally assumed (primarily due to an understandable lack of knowledge at the strategic assessment stage). As a consequence, developments invariably provide significantly less affordable housing than policy requires, and the most recent figures (October 2014 to October 2015) show a net addition of just 118 affordable homes in Guildford Borough *, which indicates that this is very much the case at a local level.

* These figures are sourced from a DCLG dataset published in December 2015 to support the provisional 2016-17 allocations for the New Homes Bonus.

Miller contends that in Guildford far too little is known about the costs associated with bringing forward the strategic housing sites to provide any confidence that the Council can secure the 40% level of provision. In particular, the Borough Council and Highways England have still to agree the details of the Road Infrastructure Strategy (see comments on RIS schemes) and the details of the proposed Sustainable Movement Corridor (SMC) are far from being confirmed, let alone costed (it is noted for example that the SMC is reliant on new stations at Park Barn and Merrow but there appears to be no commitment to these stations in the Rail spending programme). These ‘unknown’ costs will be borne by the developers and will undoubtedly affect the viability of these developments with the clear consequence of seeing the affordable housing contribution (one of very few negotiable costs) being reduced.

If the Council is to deliver any significant level of affordable housing it must bring forward a greater number of housing allocations that are not overly burdened by high infrastructure costs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The plan notes at paragraph 4.6.1 that infrastructure provision and upgrading has not always kept pace with population growth, employment and transport demands and that in parts of the Borough some infrastructure is currently at or near to capacity, or of poor quality.

Miller is of the opinion that this is particularly true of the radial routes in to Guildford that will be the principal transport corridors between the strategic allocations and the county town. With the exception of Wisley Airfield, whilst the strategic highway network, notably the A3, provides the main link more distant employment centres, if the sustainable transport objectives of the Council are to be achieved it is the local network that must have the capacity to accommodate the level of housing growth proposed.

Of particular concern are the links between Gosden Hill Farm and Guildford town centre and the link between Blackwell Farm and the town centre. Miller is of the opinion that the Council has not adequately demonstrated that these routes have the capacity to accommodate the anticipated levels of traffic that will be generated by these developments at the peak period on the highway network. Furthermore, Miller questions whether the proposed Sustainable Transport Corridors envisaged are deliverable within either a reasonable timescale or at a cost that can be funded by the developments they primarily serve. When contributions to the cost of improvements to the strategic highway network and rail services are fully taken into account the viability of these schemes could well be threatened or their delivery significantly delayed.

In relation to Blackwell Farm, the Council and Highways England are yet to identify how the physical improvements linking to the A3 and A31 can be physically provided and in the absence of this link Miller does not see how the existing network of roads (which serve the Science Park, Sport Park, university campus, County Hospital and the Tesco foodstore could be used as a ‘secondary’ through route from the A31. This part of the highway network is clearly at, or already exceeding, its design capacity at peak times as is evidenced by the queuing back of traffic through Park Barn and the Tesco roundabout / A31 junction at peak periods; these being parts of the network that should be clearly kept free flowing for emergency vehicles.

Whilst Policy I1 indicates that infrastructure needed to support development, to be secured through planning obligations and other funding, ‘should be provided and available when first needed to serve the occupants and users of the development’, Miller is concerned about the reference to the word ‘should’; especially when the policy goes onto state that ‘where necessary supporting infrastructure is not secured, development may be phased to reflect infrastructure delivery, or will be refused’.

It is considered that this caveat is not surprising in circumstances where the proposed infrastructure improvements have not been agreed between the relevant authorities and have certainly not been costed accurately. Miller therefore maintains that there is no certainty that the strategic allocations can be delivered in a timely manner and that it is extremely possible that housing delivery could be postponed beyond the end of the plan period.

We note also that despite the Plan relying on rail improvements and the provision of two new stations there appears to be no funding committed to deliver these improvements. The recently published Invitation To Tender (ITT) for the next South Western Rail Franchise (due to commence in 2017 for a period of at least ten years) makes no provision or reference to the next franchisee being required to make or enable such improvements, and on this basis it is difficult to see how such aspirations will come to fruition.

Finally, Policy I1 confirms that the Community Infrastructure Levy (CIL) will be used to secure additional financial contributions from developers and that such money will be supplemented by diverting 25% of the CIL receipts originating from each Parish and from Guildford. It is not clear if this additional income for ‘highway’ improvements will be sufficient in the event of a shortfall from developer contributions and a shortfall in other funding streams.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
**Comment ID:** PSLPP16/17343  **Respondent:** 15280737 / Miller Developments (David Milloy)  **Agent:** The Chine Consultancy Advice Ltd (David Pugh)

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( No )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

The plan notes at paragraph 4.6.1 that infrastructure provision and upgrading has not always kept pace with population growth, employment and transport demands and that in parts of the Borough some infrastructure is currently at or near to capacity, or of poor quality.

Miller is of the opinion that this is particularly true of the radial routes in to Guildford that will be the principal transport corridors between the strategic allocations and the county town. With the exception of Wisley Airfield, whilst the strategic highway network, notably the A3, provides the main link more distant employment centres, if the sustainable transport objectives of the Council are to be achieved it is the local network that must have the capacity to accommodate the level of housing growth proposed.

Of particular concern are the links between Gosden Hill Farm and Guildford town centre and the link between Blackwell Farm and the town centre. Miller is of the opinion that the Council has not adequately demonstrated that these routes have the capacity to accommodate the anticipated levels of traffic that will be generated by these developments at the peak period on the highway network. Furthermore, Miller questions whether the proposed Sustainable Transport Corridors envisaged are deliverable within either a reasonable timescale or at a cost that can be funded by the developments they primarily serve. When contributions to the cost of improvements to the strategic highway network and rail services are fully taken into account the viability of these schemes could well be threatened or their delivery significantly delayed.

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We note also that despite the Plan relying on rail improvements and the provision of two new stations there appears to be no funding committed to deliver these improvements. The recently published Invitation To Tender (ITT) for the next South Western Rail Franchise (due to commence in 2017 for a period of at least ten years) makes no provision or reference to the next franchisee being required to make or enable such improvements, and on this basis it is difficult to see how such aspirations will come to fruition.

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/2524</th>
<th>Respondent: 15280737 / Miller Developments (David Milloy)</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2</td>
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The RIS includes three strategic road improvement projects comprising improvements to the M25 and improvements to Junction 10 / A3 (the Wisley Interchange), which are anticipated ‘to commence’ in Road Period 1 (2015/16 to 2019/20) and the improvement of the A3 between Guildford and the Hogs Back A31 junction which is anticipated to ‘commence’ in Road Period 2 (by 2024/25).

It is to be noted that the RIS does not consider any improvement of the Ripley junction on the A3 that will serve the Wisley Airfield strategic allocation, or the proposed improvements to the Burpham junction on the A3 that will serve the Gosden Hill Farm allocation. Although the RIS includes improvements to the A3 / A31 junction it is not known how this might assist access to Blackwell Farm. It is assumed, as set out in Policy I1 that improvements to the network generated by the allocations will be funded exclusively by the developers.

Notwithstanding, the above it is clear that, as things stand, the improvements have yet to be agreed between the Council and Highways England and as such the effect of these improvements cannot be taken into account by the developers when assessing the highway implications of their own developments. This could further frustrate delivery of the strategic sites; especially if the Guildford improvements are not ‘anticipated’ to commence until Road Period 2, i.e. possibly not until 2025.

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Comment ID: PSLPP16/2525  Respondent: 15280737 / Miller Developments (David Milloy)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Paragraph 4.6.21 confirms that Policy I3 promotes the use of sustainable transport modes to ensure ‘safe and suitable access will be achieved and improvements will be undertaken within the transport network that cost effectively limit the significant impacts of the development’. This strategy concentrates on walking and cycling access, the use of public and community transport and the promotion of Park & Ride, to be paid for by developers and by CIL.

Miller maintains that without significant investment in the local highway network it is difficult to prioritise public transport and Park & Ride as a sustainable mode. Whilst the Council has committed to its Sustainable Movement Corridor (paragraph 4.6.24) it is not understood how the proposed ‘rapid and reliable’ routes for buses or to the rail stations can be provided, or what the cost of these improvements is likely to be. Whilst the routes may have been identified, paragraph 4.6.25 makes it abundantly clear that these improvements are at present ‘aspirational’ at best:

‘The measures applicable to each development proposal will vary on a case-by-case basis, according to the type and scale of development proposed, its location, and the level of existing transport infrastructure and services in the
immediate area. This could also include a financial contribution for the implementation of schemes beyond the scope of an individual development to deliver.

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Answer (if comment is on questions 1-7 of the questionnaire): ( )
It is accepted that development opportunities in Surrey are constrained by the AONB, which is a national designation that presumes against development except in ‘exceptional’ circumstances.

It is noted that the AGLV has been retained pending a decision by Natural England as to which areas should be included within the extended AONB. If the existing AONB is to be protected it is important to complete the review at the earliest opportunity to ensure that the planned strategic housing allocations do not have a detrimental impact on the wider landscape.

Miller notes that an independent review has been undertaken of the area to the north east of the Hogs Back which concludes that this area meets Natural England’s AONB designation criteria. It is considered that this review should be completed before the strategic housing allocation at Blackwell Farm is confirmed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/2519</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( No )</td>
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It is recognised that the extent of the Green Belt around Guildford represents a particular constraint on development but some Green Belt release is necessary if the Borough is to meet its development needs.

In this context the Council prepared its GBCS to help inform the plan making process, the most recent version of which was published in 2014. This assessed the quality of various sites located adjacent to the existing built up area of Guildford and abutting smaller villages / settlements.

By ranking the various attributes of the sites, taking into account SHLAA returns and making enquiries as to the availability of sites that had previously not been identified the Council published for consultation its Strategy and Sites Document in 2014.

This GBCS has been updated to include, inter alia; an assessment of Wisley Airfield site and other development opportunities which were not considered by the original study.

Based on the revised study, the Council has now further reviewed the release of Green Belt sites and concluded that other than the strategic allocations any development in locations should be concentrated in and immediately adjacent to the existing settlements.

However, the Council has responded to national planning policy and moved away from ‘washing over’ villages with the Green Belt designation and has now ‘inset’, or removed, those villages from the Green Belt that do not contribute to its openness. As a result, the following villages are now inset from the Green Belt: Chilworth, East Horsley, Effingham, Fairlands, Flexford, Jacobs Well, Normandy, Peasmarsh, Ripley, Send, Send Marsh / Burnt Common, Shalford, West Horsley and Wood Street Village. A number of major previously developed sites have also been inset. To facilitate development around Guildford, selected villages and the former Wisley Airfield certain areas have been removed from the Green Belt.

Against this background, Policy P2 reaffirms the usual presumption against ‘inappropriate’ development in the Green Belt,
except for those uses identified in the NPPF and appropriately scaled extensions, replacement buildings and limited infilling in identified settlement boundaries.

Miller is concerned that there is no ability to bring forward alternative allocations in the event that the Council fails to meet its housing needs on the larger strategic sites.

In such circumstances, Miller considers that the Council should either reduce the reliance on the strategic sites and allocate a number of small to medium sized allocations (between 100 and 300 dwellings), or should revert to identifying a range of ‘safeguarded sites’ which are capable of being brought forward without delay in the event of a failure by bring forward the strategic allocations; either due to the lack of supporting infrastructure or developer’s concerns about market conditions generally.

In relation to ‘safeguarding opportunities’, the sites previously identified should be reviewed in the context of other sites put forward in response to the 2014 consultation into the Strategy and Sites Document and sites subsequently promoted through the SHLAA.

Miller maintains that safeguarded sites will ensure that should alternative allocations be required the Council will be able to direct development to the most sustainable sites and resist sites being advanced in inappropriate locations.

We also note that whilst the Council has continued to use the spatial hierarchy to inform its allocations, it has also relied on the Sustainability Appraisal (http://www.guildford.gov.uk/media/15039/Volume-I-plus-Appendix-I-and-II---Guildford-Borough-Green-Belt-and-Countryside-Study/pdf/Volume_I_Guildford_Borough_Green_Belt_and_Countryside_Study.pdf) and the Green Belt Sensitivity Assessment (http://www.guildford.gov.uk/newlocalplan.CHttpHandler.ashx?id=16835&p=0). With regard to the latter, Miller recognises the importance of working to preserve the purposes of the Green Belt, but at the same time notes that such a sensitivity assessment can be subjective in terms of if and how the purposes are weighted, particularly as the scoring of whether each parcel meets three or more of the purposes of the Green Belt (thereby being deemed “high sensitivity”) is based on a one sentence statement of supposed fact regarding each purpose. In relation to Miller’s site (H8-C), we question the validity of the assessment made as to its high sensitivity, as we address this later in this submission.

We are concerned at the inconsistency in the Council’s approach to assessing both the sustainability and sensitivity of Green Belt sites, and how this has led to certain sites being discounted (rejected) in the Land Availability Assessment.

For instance, a number of sites (such as ours – H8-C) have been rejected for the stated reason of “identified in the GBCS but within high sensitivity Green Belt”, yet these two assessments do not consider sites on the same basis. For instance, H8-C had a site-based sustainability ranking of 5 out of 41 in the GBCS, thereby confirming its highly sustainable status.

By contrast, the Green Belt Sensitivity Assessment considered the whole of a wider area known as H8 (which included a far more extensive area comprising H8A, H8B, H8C and the open fields, woodlands and hedgerows stretching down to Wood Street Village). As a result, whilst the key purposes of the Green Belt (such as preventing neighbouring towns from merging into one another) would be prejudiced if the whole H8 area was to be developed, the same conclusion would not be reached if the Green Belt Sensitivity assessment was applied merely to the PDA itself. Against this background the process is considered to be fundamentally flawed and unsound – as it makes a judgement on a potential development area (PDA) based on how the purposes of the Green Belt apply to a much larger area. We have no doubt that the purposes of the Green Belt in relation to PDA H8C (which is what should be considered in relation to the suitability of this parcel of land for Green Belt) are considerably different (i.e. low to medium sensitivity) compared to how the purposes apply to all of H8 when considered as one. This appears to be a consistent theme through the Council’s approach to individual sites, which may have led to some sites being rejected when on their individual merits may have been considered acceptable from both a sustainability and sensitivity perspective.

Miller has further concerns at how the Sustainability Appraisal and the Green Belt sensitivity assessment have been disregarded in relation to the proposed strategic site at Normandy and Flexford. Notwithstanding the fact that there may be a need for a new secondary school (albeit not yet proven), we are not convinced that granting such an exception is consistent with not granting exceptions for other sites that help meet identified wider local needs, such as H8-C. Ignoring the Sustainability Appraisal in relation to the Normandy site is significant, given that the Flexford part (the majority) of this strategic site was given a sustainability ranking of just 34 out of 41, meaning that it was considered to be of low
sustainability. Miller believes that the Council would struggle to defend the inclusion of such a site whilst excluding others which have a much higher sustainability ranking (and by virtue of their smaller scale would have a much less significant impact on the Green Belt). In summary, to include a strategic site with a very low sustainability ranking and high sensitivity in the Green Belt whilst excluding others of a much less contentious nature would give rise to challenge on grounds of consistency and soundness.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2520  Respondent: 15280737 / Miller Developments (David Milloy)  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Beyond the Green Belt there are areas of countryside around the villages of Ash, Ash Vale and Tongham to the west of the Borough. Whilst the Spatial strategy identifies certain areas of countryside around these settlements for development Policy P3 seeks to protect the gaps between Ash, Tongham and Aldershot.

It is considered therefore that other than the land currently allocated to the west of the borough no further sustainable development opportunities can be brought forward.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17336  Respondent: 15280737 / Miller Developments (David Milloy)  Agent: The Chine Consultancy Advice Ltd (David Pugh)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

At paragraph 4.1.1 the Council rightly acknowledges the presumption in favour of development and confirms that Local Plans must plan positively to meet the area’s objectively assessed development needs. It then goes on to state that the local plan must ‘be flexible enough to adapt to rapid change’.

It is Miller’s view that the plan is over dependent on large strategic housing sites and that should these be delayed in coming forward for any reason the plan does not provide the flexibility to bring forward alternative sites to meet any housing shortfall. Equally, as the ‘presumption’ also informs decision making decisions it is considered that should the
Council fail to identify a five year housing land supply and fall behind on its housing delivery targets pressure will mount on unallocated sites.

The bringing forward of unallocated sites in an uncoordinated fashion will put pressure on the objectives of Policy S1 which seeks to ‘improve the economic, social and environmental conditions of the area’.

Whilst Policy S1 provides for the assessment of applications for which there are no relevant policies it is considered that the Plan Strategy will place undue reliance on this provision and whilst unplanned development may be able to mitigate any adverse impacts they may well not result in development in the most sustainable locations.

Accordingly, Miller considers that a wider range of housing allocations should be promoted with the reliance on the larger strategic site reduced or deferred to the next plan period when the ‘critical’ infrastructure has been provided. A wider range of housing allocations would also ensure that a more balanced approach is taken that spreads the impact of such development across the Borough on a scale that can be supported by ongoing infrastructure improvements, as opposed to the major schemes that would be required for the proposed strategic sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/2513  **Respondent:** 15280737 / Miller Developments (David Milloy)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Miller does not raise a particular concern about the over-arching development strategy that principally adopts the sequential approach which seeks to direct development to Guildford, the urban areas and certain lower order settlements, concentrating where possible on ‘brownfield’ opportunities.

Miller’s principal objection relates to the policies reference to the fact that:

*The delivery of homes is expected to increase over the plan period, reflective of timescales associated with the delivery of strategic sites and infrastructure. The housing target each year is as set out below, however, this is not a ceiling, and earlier delivery of allocated sites will be supported where appropriate, subject to infrastructure provision.’*

The above merely acknowledges Miller’s concern that the Plan is over-reliant on the large strategic housing sites and the uncertainty that surrounds the ability to deliver the strategic infrastructure needed to serve them.

In this context, the Council envisages 2,950 dwellings being provided in the first 5 years of the plan period, 3,500 in the second period and 3,945 in the final period. Whilst there is no requirement to distribute delivery evenly throughout the plan period it cannot be considered to be ‘good planning’ to provide fewer units than needed in the early phase of the plan and risk falling short of the increased delivery requirement at the end of the period, particularly when the most recent figures * (October 2014 to October 2015) show a net addition of just 404 units to Guildford Borough’s Council Tax Base, reflecting a continued shortfall against the annual figure of 693 homes, as last year’s SHMA indicated. The stated target of just 500 units in 2018/19 indicates an unwillingness to take timely steps to address the historic and continuing shortfall, thereby exacerbating the housing problems in the borough. At the rate proposed, the SHMA figure for Guildford Borough will not be met until the fifth year of the Plan.
These figures are sourced from a DCLG dataset published in December 2015 to support the provisional 2016-17 allocations for the New Homes Bonus.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/629  Respondent: 15280737 / Miller Developments (David Milloy)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

We have reviewed the evidence base, and whilst we recognise that a considerable amount of material has been produced, we are concerned at the reliability of some of the evidence and its application. We are particularly concerned that the evidence has been used inconsistently in order to reach different conclusions between the various Plan stages.

Of greatest concern is the departure from the original (2014) Green Belt and Countryside Study (GBCS), which concluded that development adjacent to Fairlands (and our site, H8-C, in particular) was very sustainable and that development could be accommodated without compromising the purposes of the Green Belt. This conclusion ultimately led to the lands to the west of Fairlands being ‘safeguarded’ for future development.

Most recently, however, a totally different conclusion has been reached following a review of the GBCS (February 2016). This most recent assessment has concluded that:

'No major village expansions were considered appropriate within the surroundings of Chilworth, East Horsley, Fairlands, Pirbright, Ripley, Shalford and Wood Street Village due to a combination of environmental constraints, limited sustainability credentials, and the potential impact on the purposes and openness of the Green Belt within Guildford Borough'.

As a consequence, the safeguarding of the land adjacent to Fairlands has been removed.

Nothing has changed in the period between these two conclusions being reached which leads us to question the both the appropriateness of the evidence base and the subjective way it has been applied.

Equally, we are surprised by the lack of evidence supporting how the purposes of the Green Belt have been assessed in relation to individual sites through the sensitivity assessment. The Green Belt Purposes Assessment (http://www.guildford.gov.uk/media/16830/Appendix-1-Green-Belt-Purposes-Schedule.pdf/App_1_Green_Belt_Purposes_Schedule.pdf) provides no rationale or detail to support each single sentence that assesses whether a particular location satisfies each of the four Green Belt 'purpose' tests. Overall, it is considered that too much importance is given to such a subjective assessment; resulting in potentially highly sustainable development opportunities being ruled out in some cases and unsustainable locations being allocated for development in relation to others.

Finally, the lack of evidence provided to support certain allocations and policies is particularly concerning. Given the emphasis placed on strategic sites, the lack of evidence (i.e. the lack of any agreed strategy) for the infrastructure improvements required to enable these is concerning. In this regard we are concerned that as Guildford BC relies so heavily on these larger allocations to deliver its Objectively Assessed Need (OAN) any delay will have very serious implications, particularly in the short to medium term, in meeting the five year housing supply.
**Comment ID:** SQLP16/630  **Respondent:** 15280737 / Miller Developments (David Milloy)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** (No)

We are not convinced that the Proposed Submission as a whole is legally compliant, particularly with regard to the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012. One of the requirements for the preparation stage of the Plan is to develop alternatives and options and appraising them through sustainability appraisal and against evidence. For the reasons we have set out in this Submission, we do not believe that the Council has (a) taken a meaningful approach to developing alternatives and options nor (b) assessed them against evidence, or applied a sustainability appraisal in a logical manner. This is contrary to paragraph 182 of the NPPF which makes clear that explicit consideration of alternatives is a key part of the plan making process.

This shortcoming is particularly concerning in light of the strong possibility of a number of the strategic allocations not being delivered (or delayed in coming forward), which would result in other sites being needed as an alternative. In particular, the removal of a number of safeguarded sites from this latest version of the Plan leads to concerns about the lack of any identified alternatives during the Plan period, many of which have been collectively dismissed on the Council’s internal assessment of high sensitivity. This would appear to be contrary to Regulation 12 (2) of The Environmental Assessment of Plans and Programmes Regulations 2004 No. 1633.

We are also concerned that the Council has not demonstrated due regard for other strategies and relevant matters, including the local transport plan and transport facilities and services. It is evident from the shortcomings on infrastructure requirements, particularly in relation to the strategic sites, that the Council has not taken a joined up approach on these matters, which runs contrary to Section 19 (2), Regulation 10 of the Planning and Compulsory Purchase Act 2004 (as amended).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** SQLP16/1938  **Respondent:** 15280737 / Miller Developments (David Milloy)  **Agent:** The Chine Consultancy Advice Ltd (David Pugh)

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/632  Respondent: 15280737 / Miller Developments (David Milloy)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

The test of soundness requires the plan to be:

1. Positively prepared - in so far as it should be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is practical to do so consistently with the presumption in favour of development;
2. Justified - in that it should present the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
3. Effective - it should be deliverable over the plan period (in this case by 2033) and be based on effective joint working on cross-boundary strategic priorities; and
4. Consistent with national policy - in that the policies should enable the delivery of sustainable development in accordance with the policies that comprise the development plan framework.

These representations question the housing and infrastructure strategy in circumstances where the two are interlinked. Indeed, paragraph 4.6.16 of the plan confirms:

The implementation of the three RIS (Road Infrastructure Strategy) schemes during the Plan period, alongside other critical infrastructure, is required in order to be able to accommodate future planned growth both outside and within the borough. It is therefore important that the developers of proposal sites adjacent to the A3 and M25 and other
large sites work closely with Highways England to ensure that their layout and access arrangement(s) are consistent with Highways England's emerging schemes.

Miller consider the plan is NOT sound in so far as:

1. The housing numbers for the plan period are at the lower end of the OAN.
2. The housing strategy is overly dependent upon the Strategic Housing sites with no realistic fall back should they fail to be delivered.
3. The plan is back-loaded in that the greater proportion of the planned housing will come forward toward the end of the plan period.
4. The strategic sites are 'critically' dependent upon infrastructure improvements, notably highways, for which the Borough Council, the County Council and Highways England have yet to agree. In this regard the Plan:
   1. fails to identify what improvements are necessary.
   2. fails to demonstrate whether strategic highway improvements can deal with the cumulative impact of the strategic sites.
   3. fails to satisfactorily demonstrate how the local highways network can cope in advance and during the construction of the strategic highway improvements and
   4. has not demonstrated that the improvements are deliverable in the timescales identified for the delivery of housing.
5. The proposals for the planned 'Strategic Movements Corridor' are at best in their infancy. Whilst they nod to sustainability in prioritising bus, cycle and pedestrian priority, the routes are already heavily congested and would need significant widening if the stated objectives are to be achieved.
   1. The programming of these works and the delivery of the Road Infrastructure Improvements has not been confirmed. It is not known how, or whether, the existing demands on the strategic and local highway network can be accommodated whilst these major improvements are undertaken.

In light of the above, Miller is of the opinion that the Council is extremely unlikely to deliver the OAN, and that in reality delivery will slip into the next plan period.

Furthermore, given the significant costs associated with the critical infrastructure improvements (not just highways) required to bring forward the principal strategic sites it is considered that their viability will be under extreme pressure which in turn will affect their ability to deliver the target of 40% affordable homes.

For the above reasons, in relation to housing and infrastructure provision, the Plan is considered to lack clarity and the evidence required to demonstrate that the strategy will be able to meet the needs of the Borough. It is therefore the conclusion of Miller that the Plan fundamentally fails the tests of soundness identified above.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/633</th>
<th>Respondent: 15280737 / Miller Developments (David Milloy)</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate</td>
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</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)
Whilst we have not considered the Duty to Cooperate in any great detail, we note that the Council jointly commissioned a West Surrey Strategic Housing Market Assessment (SHMA) exercise with the neighbouring local authorities of Woking and Waverley. This SHMA set the annual housing requirement (objectively assessed need) for each of these three local authorities. The fact that Guildford intend to fall short of meeting this annual OAN figure during the first four years of its Plan raises concerns that they are likely to fail in meeting their Duty to Cooperate on an ongoing basis, particularly in light of historical shortfalls in housing delivery and the uncertainty over the deliverability of strategic sites. This could lead to the neighbouring local authorities facing pressure to deal with the shortfall when it arises.

It is also unclear whether the Council has sufficiently co-operated with neighbouring local authorities in order to determine how site allocations in each borough might impact on existing highways infrastructure.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** SQLP16/634  **Respondent:** 15280737 / Miller Developments (David Milloy)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

Yes, we are interested in participating at the Examination, to expand on the points we have made in our submission.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** SQLP16/1941  **Respondent:** 15280737 / Miller Developments (David Milloy)  **Agent:** The Chine Consultancy Advice Ltd (David Pugh)

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Yes, we are interested in participating at the Examination, to expand on the points we have made in our submission.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
Comment ID: pslp173/780  Respondent: 15280737 / Miller Developments (David Milloy)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Normandy and Flexford

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In our earlier submission we set out our concern that the Council has not taken a meaningful approach to developing alternatives and options; nor assessed them against evidence or applied a sustainability appraisal in a logical manner - despite one of the requirements for the preparation stage of the Plan is to develop alternatives and options and appraising them through sustainability appraisal and against evidence. This remains our view, however our concern on this is now heightened in light of the removal of sites such as A46 (Normandy and Flexford). Whilst we disagreed with this allocation (and therefore welcome its removal), we note that it was in an even earlier version of the Plan as a safeguarded site, thereby at least providing an identified alternative during the Plan period. Its complete removal leads to further concerns about the almost complete lack of any identified alternatives during the Plan period. Given the likelihood of a number of remaining strategic sites facing deliverability issues (due to infrastructure challenges) during the Plan period, it seems highly deficient to exacerbate the approach of not having the flexibility of other, more deliverable sites that could be brought forward in such circumstances.

As we previously set out, we remain concerned that the Council has not demonstrated due regard for other strategies and relevant matters, including the local transport plan and transport facilities and services. It is evident from the shortcomings on infrastructure requirements, particularly in relation to the strategic sites, that the Council has not taken a joined up approach on these matters, which runs contrary to Section 19 (2), Regulation 10 of the Planning and Compulsory Purchase Act 2004 (as amended).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3492  Respondent: 15280737 / Miller Developments (David Milloy)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In introducing the site allocations, the Plan confirms that the objective is to bring forward housing sites in the earlier stages of the plan period, to help boost housing supply. It is acknowledged also that those sites that are constrained and are identified to come forward in later years should be encouraged to come forward sooner.

Miller is once again challenging the spatial strategy and its over reliance on larger strategic housing allocations (those over 1000 dwellings) on the basis that they are dependent upon the provision of infrastructure, especially highway improvements, which are yet to be specified, costed or accurately programmed for delivery. Although there is now some additional detail (such as what improvements will be necessary along the A3) the Council has still not indicated whether such changes will provide the necessary highway capacity and how they will be funded.
We reiterate our view that the Guildford Borough would be far better served by a more flexible approach that enabled a greater number of modestly sized sites, properly distributed across the borough - on a scale that was put forward in earlier iterations of the Local Plan. Whilst some of the strategic sites have their attributes, they can only realistically be partially developed during the Plan period (subject to wider infrastructure provision), so alternatives do need to be developed. Even though the Normandy / Flexford site (which had a number of deliverability issues) has now been removed, there remain concerns about the likely AONB restrictions in relation to the Blackwell Farm site.

It is considered that the Plan should identify a number of more modestly sized sites (such as H8-C) across the borough as a whole, as an alternative and / or in addition to relying almost exclusively on the larger allocations.

We therefore reaffirm our view in support of H8-C, which is ideally placed to deliver housing in the early stages of the Plan period. If GBC is unwilling - as it appears - to make a positive decision in respect of this allocation, we therefore look to the Inspector (when he is reviewing GBC's questionable approach to OAN and Woking's unmet need) to consider including this site to help address the shortfall. H8-C would:

1. Provide for a level of development that respects the character of - and be subservient to - the existing village.
2. Not necessitate access through the village which is already constrained by the narrow road layout, on street parking, the left in left out access junction on the A322 and the school traffic that causes congestion during the AM and PM peak periods.
3. Provide access to the school from the south which would remove school traffic from the village, particularly as the school continues to expand its pupil numbers over the coming years (as it does again this coming September).
4. Provide safe pedestrian and cycle routes and highway improvements to the A322 including a new pedestrian crossing to enhance access to the school, in line with the objectives of the recently approved School Travel Plan.
5. Ensure a scale of development which can be accommodated with improvements to the foul sewers, an upgrade of the electrical power and the new access. These improvements are of a level that would not constrain the ability to deliver a policy compliant level of affordable housing.
6. Ensure that any minor loss of common land would be compensated for and the development can provide on-site public amenity space which links via existing and proposed footpaths to the immediately adjacent common.
7. Ensure that the purposes for designating the Green Belt would be largely unharmed as the site is well screened by existing mature tree and hedgerow boundaries that will preserve the openess of the wider Green Belt. For the reasons set out above the other purposes of the Green Belt would be maintained.

For the above reasons Miller maintains that Site H8-C (which comprises of land at Hook Farm / Hunts Farm) should be allocated for development which would ensure housing coming forward during the early part of the Plan period and reduce the risks associated with relying on the larger housing allocations which are infrastructure dependent which could affect their viability and delivery.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
As we set out in our earlier representation, we are concerned at the reliability of some of the evidence and its application. Our concerns in this respect are reinforced by GBC's approach to housing numbers, and whether the proposed reduction can be justified from an evidence perspective. In particular, we are far from convinced the country's in-principle decision to leave the European Union (i.e. Brexit) is having a quantifiable impact on employment numbers, with a resulting reduced demand for housing. We believe this assessment to be highly dubious and would question its validity. We are not aware of any other local authorities - including those neighbouring to GBC - who have taken an approach along these lines.

In setting out this concern, we have reviewed the submission recently made by the Home Builders Federation (HBF) to this same consultation, in which they make a number of persuasive points. They note that there is an inherent uncertainty in employment forecasts and "as such the NPPG does not require a mechanistic matching of labour supply and planned housing provision". They go on to express concern that no consideration has been given to the level of job growth elsewhere in the Housing Market Area (HMA), even though Planning Practice Guidance sets out that employment trends and growth in working age population should be considered across such an area. As such, the approach taken by GBC in this regard is not consistent with national policy.

In particular, we are concerned that Guildford's unilateral approach in this regard is likely to be found wanting. At the recent examination hearings for the Waverley Draft Local Plan, the Inspector set out his view that it would be appropriate for Waverley and Guildford to accommodate the unmet need from Woking. In GBC's rush to reduce their housing numbers - and their Guildford-only economic assessment - they appear to have had no regard for the wider HMA, despite originally commissioning the SHMA (with these neighbouring local authorities) that produced the baseline OAN for all three areas. It does appear that Guildford was willing to work across the HMA when required to do so (in order to produce a shared evidence base) but it has now arbitrarily detached itself from this to reshape its own figures in isolation - through the SHMA addendum which has been solely commissioned by GBC. This approach does not stand up to even the most basic scrutiny from a consistency and reliability perspective. Indeed, rather than looking at how they could meet Woking's unmet housing needs, Guildford are looking to do the opposite by reducing their own housing requirement, despite the Inspector on the Waverley Draft Local Plan suggesting that Guildford would need to take account of this.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<tr>
<th>Comment ID:</th>
<th>pslp17q/225</th>
<th>Respondent:</th>
<th>15280737 / Miller Developments (David Milloy)</th>
<th>Agent:</th>
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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): (No)**

Despite our previous objections as to the over reliance on the Council's proposed strategic allocations we note that GBC has maintained this strategy albeit reduced the capacity of each of these large allocations to reflect its reduced housing target. We note also that the Council has indicated that the delivery of these sites is to be phased to come forward during the latter period of the plan to coincide with the infrastructure improvements (mainly highways) that will be necessary to facilitate the development of these sites. Whilst the Council has now indicated the likely improvements that will be necessary along the A3 corridor it has failed to indicate satisfactorily whether these improvements will provide the necessary highway capacity and how this will be funded. They have also not detailed how these various improvements would affect the functioning of this strategic road which remains one of the principal arterial routes to the south coast. Prolonged improvements to the operation of the A3 will also severely hamper the economic performance of Guildford town centre which will also be affected by other road improvements that are targeted at bus and cycle priority. There is every likelihood that these various infrastructure improvements will be delayed due to phasing requirements or a potential lack of funding (central funding or through developer funding).
We therefore remain concerned therefore that the Council's ability to deliver its strategic allocations (even though these have been reduced in scale) will result in the abject failure of the Council to meet its 'Objectively Assessed Need' in particular we consider the Council has adopted a very short term approach to the future economic performance of the Borough which appear to be; based on judgements that appear specific to Guildford and do not appear to be consistent with any national advice as to a sustained downturn in performance over the whole of the Plan period.

We are, as a consequence of the above, concerned that the Council will fall further and further behind its housing delivery target in circumstances where it has consistently been unable to identify a five year housing land supply. Currently the Council is only able to identify just over two years' supply with its own estimates suggest that it will be many years into the Plan period before historic shortfalls can be made up. This is to be achieved with limited reliance on the strategic allocations which are not expected to contribute until 2022/23 at the earliest. In reality, no sooner than the Council has addressed historic shortfalls the strategic allocations will stall and supply will again fall off.

In summary, we believe the plan to be unsound because the Council has:

1. Failed to adequately justify its revised economic projections.
2. Failed to justify it revised housing figure which we do not consider have been objectively assessed.
3. Not consulted adequately with the neighbouring authorities and in particular has not updated its projections in light of the Inspector's finding in relation to the Waverley Plan nor has it responded to the recent changes to the Woking Plan which is relying on a site at New Zealand Golf Course to meet a significant proposition of it needs (this site is considered unavailable by the site owners).
4. Not adequately demonstrated it can identify a five year housing land supply. Whilst it is suggested that any shortfall in this regard can be addressed by the middle of the plan period this does not satisfy current housing needs (which are supposed to be objectively assessed and addressed). Furthermore, there is a real concern that the current shortfalls will be repeated when the strategic allocations fail to come forward as planned.
5. Failed to provide a detailed explanation as to the impact of the strategic and local highway improvements and how these will be funded; in circumstances where these are needed to be delivered in advance of houses being brought forward.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/226  Respondent: 15280737 / Miller Developments (David Milloy)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

In our earlier representation, we set out our concerns that Guildford's intention to fall short of meeting the annual OAN figure during the early years of its Plan would be likely to result in them failing to meet their Duty to Cooperate on an ongoing basis. This is now reinforced by the approach being taken in unilaterally reducing the OAN figure, despite recent indications from the Inspector on the Waverley Plan that Guildford may have to meet some of Woking's need.

We therefore believe that the Council's approach - particularly over recent months in commissioning their own SHMA addendum without involving the other local authorities in the HMA area - is highly likely to be found to be wanting from a Duty to Cooperate perspective.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I am representing St Mary’s Church, West Horsley, which has two adjacent properties at 80 East lane, West Horsley, KT24 6LQ.

These are St Mary’s Daughter Church, which you will see from Surrey Interactive has an ‘L’ shaped plot, and the adjacent Rectory (which itself borders farmland on its other side). (The two plots can also be seen on Site Allocation/Policy A41 and the map on Page 218 Of the Proposed new Local Plan.

For some while the Church has had internal discussions regarding ways to improve its facilities and planning for the future has become increasingly important as the Church grows and the influx of new residents into ‘The Horsley’s’ is set to significantly increase. So far, we have not reached any firm conclusions as to what we would like to do, but some form of improvement or redevelopment of the East Lane facilities is still high on our agenda for consideration. If any subsequent proposals required planning or any other consents, then all normal procedures would be followed.

For the time being however, we would be most grateful for your clarification and help. If you take the two properties together, they form a sizeable, almost square plot made up of the Rectory bounded on two sides by the ‘L’ shaped land upon which the Daughter Church sits. However, we have recently viewed a map which shows the new Settlement Boundary as part of the new Local Plan and it would appear that the bottom half of the Daughter Church land (i.e. the portion that runs along the back of both the Daughter Church and the adjacent Rectory) seems to be outside the proposed new Settlement Boundary. If this is the case, it could very significantly restrict our ideas in terms of improving the Church’s facilities; which of course are not only important for the Church members, but also the local community as a whole.

We would really appreciate it if you could look into this for us and confirm whether this is the case or not. If we are correct, then we would like to formally request as part of this consultation process please that this portion of our land is brought within the new proposed Settlement Boundary. If there is then a formal application process that we need to embark upon to achieve this, then please advise us and we would be pleased to follow your procedures.

Thank you

Simon Harris

For and on behalf of

St Mary’s Church

West Horsley
18.7.2016

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/3733  **Respondent:** 15281185 / Kebbell Development Ltd (Dudley Mills)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In conjunction with the owners of the above property we would like to put forward the above property as a site for a residential allocation; for Identification Purpose the site is shown red on the attached Ordnance Survey Plan. The site extends to 0.69ha and at a density of 30 dwellings per hectare could accommodate 21 dwellings.

The site is located within partly within the existing village boundary and partly within the proposed site boundary of Send, near to all the village amenities in a sustainable location. The site is outside of the Flood Plain and would provide access to adjoining properties and facilitate a larger allocation of land suitable for residential development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [Send90-92 Potters Lane Send.pdf](#) (36 KB)

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**Comment ID:** SQLP16/564  **Respondent:** 15281409 / Andrew Hogarth  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

I have read the draft plan and the supporting documents. I confess that I find myself disappointed to see that the objections to the previous edition of this document have been largely ignored and this report is simply more of the same.

There is no doubt that we need more houses as our children have nowhere to live. There is room for debate as to whether we really need to increase our housing stock by rather more than 1% a year for the foreseeable future but I accept that there is a need for considerably more housing in the Guildford.
The difficulty is how to achieve this objective without destroying the reason why we all like living in the Guildford Area. Adopting a scheme which involves putting large blobs of new housing, apparently scattered at random on a map of the area will not retain the feel and beauty of our Borough. If a proposal to increase housing in each area by 1% a year was agreed with each local area or parish we could achieve our objective of increasing our housing stock without destroying our countryside. For this reason I object very strongly to the draft local plan.

My other objection is the that I see there is a proposal to turn East Clandon into a designated settlement. This has not been discussed. NO reasons are given for this proposal. Until it is discussed and detailed reasons why this proposal is necessary are given the proposal should be rejected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  
  GBC local plan1.docx (13 KB)  
  GBC local plan.docx (13 KB)

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Comment ID: SQLP16/566  
Respondent: 15281569 / Malcolm Williamson  
Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

The provisions of the Localism Act 2011 have not been complied with in that East Hampshire District Council is not on the list of consultees. East Hampshire is part of the Wey Valley and the transport infrastructure is shared. EHDC provides an important housing location particularly for lower priced housing serving Guildford workers.

The Bordon area is outside the Green Belt South Downs National Park or the AONB. It is scheduled for development and further development can be sustained without damage to high grade environmental protection areas.

If housing from Guildford and Waverley in damaging locations were moved it could provide the logical basis for Guildford and Waverley to secure their protected areas. It would allow better infrastructure at Bordon such as the re-instatement of the Bordon Bentley Farnham Guildford rail link which is still a protected aspiration for Bordon's development. This is a key to its eco-town status. It meets all planning objectives in terms of environment, housing, affordable housing and industry and be able to fund infrastructure particularly transport via rail not even envisaged by either Guildford or Waverley's proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/565  
Respondent: 15281825 / Nigel Burke  
Agent:  

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Page 1027 of 2804
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

The evidence base should be reviewed in the light of Brexit. In particular, most commentators predict slower growth or recession for the next few years at least, and Brexit will presumably result in lower immigration, both of which are key drivers for new housing developments. Also, public finances (national and local) are also likely to come under yet more pressure, constraining supporting infrastructure developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/567  Respondent: 15281857 / Jon Dobinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

There has been a massive and material shift in the evidence base for this consultation as a result of the recent UK decision to leave the European Union, which is expected to result in significant falls in net migration and thus population, reduction in the need for and use of London office space by predictions of up to 25%, with knock-on effects for both commercial and residential property in London and the South-East, plus reduced demand for property and potentially, falling prices. Though predictions vary widely, the general thrust clearly is that the demand for property over the periods outlined in the plan will be materially lower than projected and therefore the exercise needs to be reviewed and amended to reflect these significantly changed circumstances.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/575  Respondent: 15281857 / Jon Dobinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)
The proposals in the plan are flawed as they do not take sufficient account of the need for new local infrastructure to support the massive building programme planned for West Horsley, wisely and the surrounding villages. To shoehorn huge numbers of people into an area that lacks sufficient transport infrastructure, schools and health facilities to cope is to severely damage quality of life both for existing residents and those hoping to move to the area. Worse, it gives rise to serious safety concerns. There are already many very dangerous roads and crossings throughout the Horsleys, Effingham, and Ockham, such as the junction between Old Lane and Forest Road where pedestrians cross to reach Effingham Station, plus many narrow lanes which are frequented by many cyclists and walkers reaching paintball facilities (I saw women with prams walking in the carriageway on the section of Forest Road road without a pavement last week, dodging traffic). The plan as outlined will put thousands more cars, walkers and cyclists on these roads, which will beyond doubt result in serious injuries and deaths. The road network linking these developments with shops, town centres and transport hubs is inadequate and options for increasing its safety and capacity are limited: certainly the measures in this plan are derisory and cannot conceivably cope with the additional numbers involved. There will also be a significant impact on air pollution in high traffic areas near the M25 and A3 where pollution levels are already either breaching legal limits, or are in danger of doing so: this is a growing concern throughout London and the South East, with airport expansion likely to increase the problem, and I can't see evidence that rigorous studies have been carried out to assess the additional impact of the new planned developments on areas where there are potential air quality issues. Currently, monitoring seems limited at best. As a local resident, I speak for many when I urge the council to focus on fixing existing problems before it charges headlong to create new ones. I am not opposed to development: I want to see affordable homes here for my children and for others who want to enjoy all that the area can offer, but a plan which threatens the health, well-being and quality of life of all those who live here, benefits neither today's residents nor those who might like to leave here in future. The names of those who forced through such a plan should be preserved, so that future generations do not forget the vandals who destroyed the safe, green and pleasant environment that they might otherwise have inherited.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/2290</th>
<th>Respondent: 15281985 / Puttenham Parish Council (Wendy Hazzard)</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Puttenham</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Whilst Puttenham has a very small part to play in the Guildford plan we are aware that any increase in house building and infrastructure will bring an increase in traffic to our area. We hope that the officers involved will take this into consideration. However, we feel that the need for further dwellings are desperately needed and the reality is that we will all have to shoulder this responsibility. As a village we have seen all our smaller dwellings converted into large ones so our only criticism is the percentage of low cost homes and we are at present consulting with our residents via the neighbourhood plan. The parish council feels that a much larger proportion of all new building should be low cost, especially for the rental market.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPS16/1246</th>
<th>Respondent: 15282017 / David Godman</th>
<th>Agent:</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1029

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I object to this 'strategic site' proposal as I believe it would completely change and destroy our local community. This will massively increase in the population of Normandy over the plan period.

- The local roads are already at capacity at peak hours and with several major accidents occurring on the A243 road over the few years. There is limited scope for road improvements as both Glaziers lane and Westwood Lane have either a small humped back bridge or low/single track tunnel under the railway which would be both technically and financially impossible to alter. However solving these problems would only transfer the traffic problem further along the line to the Hogs Back A31 and or A3 (Main roads already over loaded at peak times and made worse with more cars trying to a join a potentially fast moving road on a narrow slip road).
- This is a green belt site that is red sensitivity. Removing its green belt status and building 1,100 homes cannot be justified when these fields are within 3 kilometers of the Thames Basin Heaths special protection area. There need to be exceptional circumstances proven to remove land's green belt status. An up to 8 form entry secondary school is neither needed or 'exceptional circumstances'. The local plan states that ' Secondary educational need will be re-assessed at planning application stage' but if the houses have been built and there is no need found for a secondary school it will already be too late, the green belt will have been removed and the fields tarmacked and concreted over. Where will all the water that pours onto the Hogs back and Ash ranges go then, with no fields to soak it up? Glaziers Lane floods regularly as does Wanborough station without the addition of all that is proposed.
- There is no need for a secondary school as the two closest schools are undersubscribed and the building of houses cannot be used as a reason for a new school because the school is being used as an enabler for the building of the houses on green belt.
- The extra traffic that will be generated by an extra 1,100 homes and a secondary school will impact on every residents (present and future) lives, causing chaos on the roads. A Showmans site is proposed and the movement of their large equipment along the already described narrow lane, bridges and tunnels near impossible. This is a developer led proposal that Normandy residents have not had an opportunity to comment on until this late stage because this site did not appear in the 2014 version of the Draft Local Plan, so we were unable to make our needs and views known.
- The impact this proposal will have on wildlife is enormous. The Skylarks, Barn owls, Little owls, Cuckoos and other birds will lose their habitat. The Glow worms, Adders, Grass snakes and Slow worms will also. The light pollution from a development of this size will impact on our night skies, and the pets associated with these homes will also have a detrimental effect on the wildlife.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: I object Normandy Planning.pdf (226 KB)
The plan is not thoroughly thought through!!

As it is it will cause even more gridlock.

The bus station & railway station must be brought together to create a transport hub. Railway station can't move therefore the bus station needs to be at the railway station.

Compulsory purchase the Casino nightclub & surrounding buildings. Build a pedestrian only walkway from the rail station/new bus station parallel to Bridge Street through the current Casino nightclub up a ramp into a new Friary shopping centre. The clubs on Bridge street close their Bridge street doors & open out onto the new walkway. During the day this could have outside tables & chairs outside restaurants and make more use of the river.

Expand the Friary to include a new Debenhams & John Lewis where the What Not Antiques/Bojangles/Old Post Office used to be. Demolish the current Debenhams and build restaurants making more use of the river.

Use brown field sites not green field for more housing! More housing along the A3 will cause far more congestion. Tunnel under Guildford for A3 is now needed. Plus being able to get on & off both ways at Burpham & Dennis roundabout. This will stop the needless flow of traffic along Ladymead, Parkway & Burpham. At Burpham the link road to Slyfield MUST happen.

Unused office space on London Road & Epsom road should be converted to housing or flats with sufficient parking.

I'm just stating the obvious to any Guildford resident.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: SQLP16/584  Respondent: 15282241 / Elena Papazoglou  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

The land was legally designated GreenBelt. To change this is unconstitutional and illegal. I object to any building on the greenbelt land

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/586  Respondent: 15282241 / Elena Papazoglou  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

This land is greenbelt and not part of urban sprawl. I object to any building on land that was classified as GreenBelt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/587  Respondent: 15282241 / Elena Papazoglou  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

Plans are not co-operating with the fact this land is legally designated greenbelt. I object to any building on land designated as GreenBelt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<tr>
<td>I do not wish to take part in examination. I register my objection to any building on GreenBelt land</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): (Yes)</td>
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<tr>
<td>I object to any new building on GreenBelt land.</td>
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<th>Comment ID: PSLPP16/2490</th>
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<th>Agent: SSA Planning Limited (Steve Simms)</th>
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The draft policy is not based on any objectively assessed development requirement. It effectively assesses the requirement for hot food takeaways within 500 metres of the boundary of a school as zero, but does so without evidence of either a link between the incidence of obesity and the proximity of hot food takeaways to such places or any particular distance at which that link is demonstrated. Consequently, the development requirement has not been objectively assessed.

In fact, the distance chosen could have the effect of banning hot food takeaways from a majority of the Borough. No assessment has been made of the number of hot food takeaways that might be refused as a result of this or what the social, economic or environmental impacts of that might be, so it is not possible to balance these impacts.

The policy is negative in its assumptions, using the concept of ‘unhealthy food’, which is at best unhelpful in isolation from an understanding of the person eating the food, their health and lifestyle, and at worst is simply subjective. Furthermore, it assumes all hot food takeaways offer little choice and serve the same type and standard of food.

We are further of the view that food of high energy density or poor nutritional value is sold from and at a range of premises within a variety of other classes, including many in Class A1, such as coffee or sandwich shops, bakeries or, simply, supermarkets, and that focussing on Class A5 uses is both unhelpful and unfair.

There is no evidence for a causal link between the incidence of obesity and proximity of hot food takeaways to schools and only limited evidence of any correlation at all, so it is unclear how refusing planning permission for hot food takeaways within 500 metres of such locations could ever be justified.

The inclusion of primary schools is particularly problematic, as it is clear that children at primary schools are not usually permitted to leave the premises at lunchtime and, given their age, are unlikely to travel to or from school unaccompanied. Outside school time, children’s diets are quite properly the responsibility their parents or guardians.

Consequently, it is far from clear how refusing planning permission for hot food takeaways within 500 metres of primary schools could ever be justified. This was the view taken by a Planning Inspector in an appeal (APP/P4415/A/11/2159082) against refusal of a restaurant and hot food takeaway in January 2012.

The Evidence Base contains no evidence of any threshold number of hot food takeaways at which the harm that the draft policy seeks to mitigate occurs or is noticeably greater, nor any threshold distance. Indeed, there is no evidence of a causal spatial link between clusters of hot food and the incidence of obesity or overweight at all.

It is better to rely on objective evidence in a retail study to set maximum proportions of hot food takeaways. Whilst these are primarily directed at protecting the retail health of designated centres, there is scope to widen their application to support the retail health of retail provision outside centres, such as standalone or parade units.

As it is usually impractical to apply the maximum frontage proportion outside centres, the 500-metre walk distance might be applied, within which the proportion (rather than number) of units, be they in- or out-of-centre, used as hot food takeaways would not be permitted to exceed the same threshold as set for centres.

In adopting such an approach, it would be preferable to consider optimal proportions of all retail uses that could contribute to healthy centres or to a healthy offer generally, whether in- or out-of-centre, instead of focussing on particular uses considered to be a problem, apparently for wider social reasons unrelated to retail planning.

On a practical point, there is a significant difficulty in using distance radii in that it takes no account of real barriers, physical or perceptual, so that premises on the other side of a line feature such as a canal or busy road could be affected despite in reality being more than a 500m walk away. It is far better to use real walk isochrones.

For the reasons set out, it is unclear how refusing permission for hot food takeaways within 500 metres of primary schools could ever be effective.
Some hot food takeaways, together with restaurants, pubs and shops are clearly a source of cheap, energy dense and nutrient poor foods, however, not all hot food takeaways, restaurants, pubs and shops are, and the planning system is ineffective in distinguishing between those that are and those that are not.

The area that would be affected by the policy could cover a large and variable part of the Borough, so it is hard to see how the effectiveness of its extent could be monitored. Would poor or negative achievement against objectives result in reduction or expansion of the zones? What other corrective action might be taken short of its withdrawal?

Diet is clearly a key determinant both of general health and obesity levels. Exercise is the other key determinant and must be considered for a complete picture. Focussing on improving access to open space, sport and recreation facilities would be a far more effective strategy for reducing childhood obesity.

CONSISTENT WITH NATIONAL POLICY

We consider that no regard has been given to national policy and advice in preparing Policy E7 because no National Planning Policy Framework (NPPF) policies deal with dietary issues.

Specifically, taking into account proximity of hot food takeaways to schools has no basis in national policy and national practice guidance simply refers to a briefing paper containing case studies on the issue. Indeed, restricting accessibility to services and facilities is directly contrary to national policy.

The NPPF recognises the role planning takes in better enabling people to live healthier lifestyles. However, it seeks to do this by creating, not restricting choice, by increasing access to recreation and health services, and by ensuring developments are within walkable distances of local facilities and public transport to other facilities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2491  Respondent: 15282433 / Kentucky Fried Chicken (GB) Limited (Chris Holmes)
Agent: SSA Planning Limited (Steve Simms)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( No ), is Legally Compliant? ( Yes )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POSITIVELY PREPARED

The draft policy is not based on any objectively assessed development requirement. It effectively assesses the requirement for hot food takeaways within 500 metres of the boundary of a school as zero, but does so without evidence of either a link between the incidence of obesity and the proximity of hot food takeaways to such places or any particular distance at which that link is demonstrated. Consequently, the development requirement has not been objectively assessed.

In fact, the distance chosen could have the effect of banning hot food takeaways from a majority of the Borough. No assessment has been made of the number of hot food takeaways that might be refused as a result of this or what the social, economic or environmental impacts of that might be, so it is not possible to balance these impacts.
The policy is negative in its assumptions, using the concept of ‘unhealthy food’, which is at best unhelpful in isolation from an understanding of the person eating the food, their health and lifestyle, and at worst is simply subjective. Furthermore, it assumes all hot food takeaways offer little choice and serve the same type and standard of food.

We are further of the view that food of high energy density or poor nutritional value is sold from and at a range of premises within a variety of other classes, including many in Class A1, such as coffee or sandwich shops, bakeries or, simply, supermarkets, and that focussing on Class A5 uses is both unhelpful and unfair.

JUSTIFIED

There is no evidence for a causal link between the incidence of obesity and proximity of hot food takeaways to schools and only limited evidence of any correlation at all, so it is unclear how refusing planning permission for hot food takeaways within 500 metres of such locations could ever be justified.

The inclusion of primary schools is particularly problematic, as it is clear that children at primary schools are not usually permitted to leave the premises at lunchtime and, given their age, are unlikely to travel to or from school unaccompanied. Outside school time, children’s diets are quite properly the responsibility their parents or guardians.

Consequently, it is far from clear how refusing planning permission for hot food takeaways within 500 metres of primary schools could ever be justified. This was the view taken by a Planning Inspector in an appeal (APP/P4415/A/11/2159082) against refusal of a restaurant and hot food takeaway in January 2012.

The Evidence Base contains no evidence of any threshold number of hot food takeaways at which the harm that the draft policy seeks to mitigate occurs or is noticeably greater, nor any threshold distance. Indeed, there is no evidence of a causal spatial link between clusters of hot food and the incidence of obesity or overweight at all.

It is better to rely on objective evidence in a retail study to set maximum proportions of hot food takeaways. Whilst these are primarily directed at protecting the retail health of designated centres, there is scope to widen their application to support the retail health of retail provision outside centres, such as standalone or parade units.

As it is usually impractical to apply a maximum frontage proportion outside centres, the 500-metre walk distance might be applied, within which the proportion (rather than number) of units, be they in- or out-of-centre, used as hot food takeaways would not be permitted to exceed the same threshold as set for centres.

In adopting such an approach, it would be preferable to consider optimal proportions of all retail uses that could contribute to healthy centres or to a healthy offer generally, whether in- or out-of-centre, instead of focussing on particular uses considered to be a problem, apparently for wider social reasons unrelated to retail planning.

On a practical point, there is a significant difficulty in using distance radii in that it takes no account of real barriers, physical or perceptual, so that premises on the other side of a line feature such as a canal or busy road could be affected despite in reality being more than a 500m walk away. It is far better to use real walk isochrones.

EFFECTIVE

For the reasons set out, it is unclear how refusing permission for hot food takeaways within 500 metres of primary schools could ever be effective.

Some hot food takeaways, together with restaurants, pubs and shops are clearly a source of cheap, energy dense and nutrient poor foods, however, not all hot food takeaways, restaurants, pubs and shops are, and the planning system is ineffective in distinguishing between those that are and those that are not.

The area that would be affected by the policy could cover a large and variable part of the Borough, so it is hard to see how the effectiveness of its extent could be monitored. Would poor or negative achievement against objectives result in reduction or expansion of the zones? What other corrective action might be taken short of its withdrawal?
Diet is clearly a key determinant both of general health and obesity levels. Exercise is the other key determinant and must be considered for a complete picture. Focussing on improving access to open space, sport and recreation facilities would be a far more effective strategy for reducing childhood obesity.

CONSISTENT WITH NATIONAL POLICY

We consider that no regard has been given to national policy and advice in preparing Policy E8 because no National Planning Policy Framework (NPPF) policies deal with dietary issues.

Specifically, taking into account proximity of hot food takeaways to schools has no basis in national policy and national practice guidance simply refers to a briefing paper containing case studies on the issue. Indeed, restricting accessibility to services and facilities is directly contrary to national policy.

The NPPF recognises the role planning takes in better enabling people to live healthier lifestyles. However, it seeks to do this by creating, not restricting choice, by increasing access to recreation and health services, and by ensuring developments are within walkable distances of local facilities and public transport to other facilities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2492  Respondent: 15282433 / Kentucky Fried Chicken (GB) Limited (Chris Holmes)
Agent: SSA Planning Limited (Steve Simms)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? (Yes), is Sound? (No), is Legally Compliant? (Yes)

Answer (if comment is on questions 1-7 of the questionnaire): ()

POSITIVELY PREPARED

The draft policy is not based on any objectively assessed development requirement. It effectively assesses the requirement for hot food takeaways within 500 metres of the boundary of a school as zero, but does so without evidence of either a link between the incidence of obesity and the proximity of hot food takeaways to such places or any particular distance at which that link is demonstrated. Consequently, the development requirement has not been objectively assessed.

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The policy is negative in its assumptions, using the concept of ‘unhealthy food’, which is at best unhelpful in isolation from an understanding of the person eating the food, their health and lifestyle, and at worst is simply subjective. Furthermore, it assumes all hot food takeaways offer little choice and serve the same type and standard of food.

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JUSTIFIED
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The inclusion of primary schools is particularly problematic, as it is clear that children at primary schools are not usually permitted to leave the premises at lunchtime and, given their age, are unlikely to travel to or from school unaccompanied. Outside school time, children’s diets are quite properly the responsibility their parents or guardians.

Consequently, it is far from clear how refusing planning permission for hot food takeaways within 500 metres of primary schools could ever be justified. This was the view taken by a Planning Inspector in an appeal (APP/P4415/A/11/2159082) against refusal of a restaurant and hot food takeaway in January 2012.

The Evidence Base contains no evidence of any threshold number of hot food takeaways at which the harm that the draft policy seeks to mitigate occurs or is noticeably greater, nor any threshold distance. Indeed, there is no evidence of a causal spatial link between clusters of hot food and the incidence of obesity or overweight at all.

It is better to rely on objective evidence in a retail study to set maximum proportions of hot food takeaways. Whilst these are primarily directed at protecting the retail health of designated centres, there is scope to widen their application to support the retail health of retail provision outside centres, such as standalone or parade units.

As it is usually impractical to apply a maximum frontage proportion outside centres, the 500-metre walk distance might be applied, within which the proportion (rather than number) of units, be they in- or out-of-centre, used as hot food takeaways would not be permitted to exceed the same threshold as set for centres.

In adopting such an approach, it would be preferable to consider optimal proportions of all retail uses that could contribute to healthy centres or to a healthy offer generally, whether in- or out-of-centre, instead of focussing on particular uses considered to be a problem, apparently for wider social reasons unrelated to retail planning.

On a practical point, there is a significant difficulty in using distance radii in that it takes no account of real barriers, physical or perceptual, so that premises on the other side of a line feature such as a canal or busy road could be affected despite in reality being more than a 500m walk away. It is far better to use real walk isochrones.

EFFECTIVE

For the reasons set out, it is unclear how refusing permission for hot food takeaways within 500 metres of primary schools could ever be effective.

Some hot food takeaways, together with restaurants, pubs and shops are clearly a source of cheap, energy dense and nutrient poor foods, however, not all hot food takeaways, restaurants, pubs and shops are, and the planning system is ineffective in distinguishing between those that are and those that are not.

The area that would be affected by the policy could cover a large and variable part of the Borough, so it is hard to see how the effectiveness of its extent could be monitored. Would poor or negative achievement against objectives result in reduction or expansion of the zones? What other corrective action might be taken short of its withdrawal?

Diet is clearly a key determinant both of general health and obesity levels. Exercise is the other key determinant and must be considered for a complete picture. Focussing on improving access to open space, sport and recreation facilities would be a far more effective strategy for reducing childhood obesity.

CONSISTENT WITH NATIONAL POLICY

We consider that no regard has been given to national policy and advice in preparing Policy E9 because no National Planning Policy Framework (NPPF) policies deal with dietary issues.

Specifically, taking into account proximity of hot food takeaways to schools has no basis in national policy and national practice guidance simply refers to a briefing paper containing case studies on the issue. Indeed, restricting accessibility to services and facilities is directly contrary to national policy.
The NPPF recognises the role planning takes in better enabling people to live healthier lifestyles. However, it seeks to do this by creating, not restricting choice, by increasing access to recreation and health services, and by ensuring developments are within walkable distances of local facilities and public transport to other facilities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
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<tr>
<th>Comment ID:</th>
<th>pslp171/1153</th>
<th>Respondent:</th>
<th>Kentucky Fried Chicken (GB) Limited (Chris Holmes)</th>
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<td>Agent:</td>
<td>SSA Planning Limited (Steve Simms)</td>
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<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy E7</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( No ), is Legally Compliant? ( Yes )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

Whilst we support the change to include A5 as well as A3 as acceptable uses within secondary frontages, we maintain our objection to section (6) of policy E7.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Deletion of section (6) of policy E7.

**Attached documents:**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( No ), is Legally Compliant? ( Yes )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

Whilst we support additional clarity, we consider that food of high energy density or poor nutritional value is sold from and at a range of premises within a variety of other classes, including many in Class A1, such as coffee or sandwich shops, bakeries or, simply, supermarkets, and that focussing on Class A5 uses is both unhelpful and unfair.

We are also unclear why Class A5 has been specified in respect of policies E8 and E9, but not in respect of policy E7.

We maintain our objection to section (5) of policy E8.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Deletion of section (5) of policy E8.
Attached documents:

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Comment ID: pslp171/1155  Respondent: 15282433 / Kentucky Fried Chicken (GB) Limited (Chris Holmes)  
Agent: SSA Planning Limited (Steve Simms)  

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? (Yes), is Sound? (No), is Legally Compliant? (Yes)  

Answer (if comment is on questions 1-7 of the questionnaire): ()

Whilst we support additional clarity, we consider that food of high energy density or poor nutritional value is sold from and at a range of premises within a variety of other classes, including many in Class A1, such as coffee or sandwich shops, bakeries or, simply, supermarkets, and that focussing on Class A5 uses is both unhelpful and unfair.

We are also unclear why Class A5 has been specified in respect of policies E8 and E9, but not in respect of policy E7.

We maintain our objection to section (7) of policy E9.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Deletion of section (7) of policy E9.

Attached documents:

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Comment ID: PSLPS16/4277  Respondent: 15282465 / christopher alderman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:
• I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

• I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

• I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

• I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

• I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

• I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

• I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

• I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

• I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.
I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1256  Respondent: 15282497 / C Axon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the local plan with regards to the proposed development at site A46 between Normandy and Flexford villages. My principle objections are mainly on grounds of sustainability and are:

- The transport infrastructure could not support it. There is no coherent transport policy within the local plan to make it viable.
- The assessment of sustainability for the competing sites was not sound. It was applied inconsistently and disregarded some important data.
- There is no proven need for secondary school that is being used as an “exceptional circumstance” to override objections to building on greenbelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Local Plan - Objection and Comments.docx (21 KB)

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Comment ID: PSLPS16/1243  Respondent: 15282529 / Elizabeth Owen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of the villages of Chilworth, Shalford and Peasmarsh from the Green Belt. It is vital for the well-being of our citizens that they should live in pleasant open surroundings with access to the countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> ()</td>
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<tr>
<td>Maintain the heritage of the town. Build within the town to an appropriate design, venacular and stature. Design space well in order to increase the visitor experience with flow and vista. Do something about the current eyesores, especially the bus station - at the moment a complete disgrace particularly as people are meant to be be encouraged to use the bus!</td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> ()</td>
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<td>So called affordable housing will never be affordable round here and it disappears after the initial sale anyway. The only thing that will make any difference to securing housing for the 'ordinary person' in the Guildford area is building social housing, and not giving it away some time down the line. Justifying building high end housing estates in order to obtain a few 'affordable houses' is in my opinion short-sighted, shameful and not to mention immoral, and leads one to question who is actually benefitting from it?</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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</table>
The A3 acts as a mini motorway dividing the town. It used to be the ring road but has not functioned well for a number of years now. Most problems in town traffic stem from something happening elsewhere in the wider roadscape and usually from the A3, where the overuse initiates some sort of problem almost every day. Tinkering with the A3 in my opinion is not going to help - it is fundamentally in the wrong place for current needs and should be moved to flow around the urban area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2501  Respondent: 15282593 / Anne Young  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Not sure why it is thought that people that move into any future new development will behave any differently from those that have moved into any previous development?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2512  Respondent: 15282593 / Anne Young  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Commendable that green and blue space and infrastructure being recognised but not sure that basic principles for biodiversity and ecosystem requirements will be met by being built over.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2496  Respondent: 15282593 / Anne Young  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
The Green Belt serves a vital function which is necessary for a satisfactory environment for people, wildlife and their ecosystems. I do not agree with any proposal to alter or do away with any of it.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** SQLP16/609  **Respondent:** 15282593 / Anne Young  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** (No)

In my opinion much is out of date or flawed. Perhaps the council would like to share the evidence for the figures of the SHMA for instance?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** SQLP16/613  **Respondent:** 15282593 / Anne Young  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** (No)

Does the SHMA fulfil requirements for legal compliance?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** SQLP16/615  **Respondent:** 15282593 / Anne Young  **Agent:**
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<td>Answer (if comment is on questions 1-7 of the questionnaire): (No)</td>
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</table>

Still the same old same old. Lets cram more people in without considered approach and implementation of infrastructure that works. This proposed local plan is not sustainable in my opinion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Answer (if comment is on questions 1-7 of the questionnaire): (No)</td>
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In my opinion failing to produce evidence for the basics of the plan is not cooperation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do not wish to participate in Examination

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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**I OBJECT ESPECIALLY TO 6 POLICIES: A36, A37, A38, A39, A40 & A41:**
- Amount of new housing far exceeds local need.
- Housing density excessive when compared with existing development.
- Would transform the Horsleys into a sizable town, something for which no case is made.
- No local support.
- Collective impact of these 6 sites on a small part of the borough not considered. Should not be treated as isolated, separate sites.
- Total amount of new building out of scale with the planned development elsewhere the borough, especially less sensitive urban areas not protected by Green Belt.
- Sites unsustainable. Key infrastructure lacking. No adequate provision is made to increase it – e.g. poor wastewater capacity, lack of schools, absence of traffic management plan, flooding.
- No account taken of additional impact of Wisley Airfield site on Horsleys.
- Extension of settlement boundaries too permissive. Horsleys characterised by streets with development along only one side of the road. Policies allow too many adjacent green fields to be developed by squaring off boundaries and claiming they don’t contribute to Green Belt “openness”.
- Green Belt gap with neighbouring settlements hugely narrowed, especially if Wisley Airfield is built on.
- Will harm compliance with NPPF 81 – e.g. by making cycling (including Prudential cycle races) too dangerous, ruining the rural setting of Waterloo Farm campsite, destroying the ambience of Grange Park Opera’s new “Theatre in the Woods”.
- Policy A40 especially unviable because of high water table and poor drainage, leading to regular winter flooding.
- Safe access and egress at Site A40 unachievable, owing to flooding, high speed limits, poor sight lines, narrow access to existing properties, inadequate pavements for elderly and schoolchildren, increasing use by recreational cyclists etc.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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**I OBJECT ALSO TO POLICY A35 (WISLEY AIRFIELD):**
- Should not be in the plan for all the reasons the Planning Committee rejected the identical recent proposal by Wisley Investment Properties.
- Irregularity of including this policy in the plan 24 hours before this planning application was rejected (like extending the time allowed for the developers to present their application).
• Unacceptable Conservative Party links between the developers and the Council.
• No Green Belt “exceptional circumstances” presented.
• Not a brownfield site as stated – only 15% of it.
• Proposed SCC waste site ignored.
• Loss of farming land.
• Too near RHS Wisley and Thames Basin Heath SPA.
• SANG would harm on SPA.
• Will aggravate traffic jams at A3 roundabout and M25 Junction 10.
• Unacceptable increase in air pollution.
• No existing public transport and stations miles away.
• No proper traffic data.
• Housing density far too great.
• Over 2,000 houses will swamp and destroy Ockham conservation area, with impact on listed buildings.
• Access confined to inadequate narrow lanes.
• Water table and surface water flooding not considered either for site itself or for downstream areas on River Mole.
• Major impact on neighbouring villages, especially Horsleys.
• No assessment made of collective impact on area of this and 6 Horsley sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10960  Respondent: 15282625 / Kelly Graves  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY D1 (BETTER PLACES):
• Poor monitoring.
• No force given to vernacular or historic design guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10961  Respondent: 15282625 / Kelly Graves  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT TO POLICY D2 (SUSTAINABLE DESIGN ETC):
• Targets unachievable if Green Belt covered with amount of housing as proposed, causing traffic chaos, infrastructure failure and unacceptable levels of pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10962</th>
<th>Respondent: 15282625 / Kelly Graves</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
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</table>

I OBJECT TO POLICY D3 (HISTORIC ENVIRONMENT):
• Supports overdevelopment: you can’t “enhance” history. Doesn’t ban private interests from trying to make aggressive profits from privatising, commercialising and Disneyfying public historic assets.
• Doesn’t ban development near historic assets.
• Ignores NPPF 126, 131, 132, 133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<thead>
<tr>
<th>Comment ID: PSLPP16/10963</th>
<th>Respondent: 15282625 / Kelly Graves</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy D4</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
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</table>

I OBJECT TO POLICY D4 (DEVELOPMENT IN URBAN AREAS AND INSET VILLAGES)
• No commitment to expand social housing or accommodation for people who can’t afford so-called affordable homes.
• Not enough new homes in urban areas, despite demand and need for urban regeneration and protection of Green Belt.
• Objectives for inset villages cancelled out by plans for excessive housing growth there.
• Too much emphasis on traditional shops, when a lot of this sector is in terminal decline.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/10952 | Respondent: 15282625 / Kelly Graves | Agent: |
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY E1 (EMPLOYMENT):
• Poor evidence base.
• Too much encouragement to low added-value employment that’s needed elsewhere in the country.
• Fails to concentrate general business activity in urban areas or business parks that have the infrastructure.
• Fails to differentiate this from appropriate rural business.
• Too much encouragement of warehousing, for which Guildford is too congested.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

 Comment ID: PSLPP16/10953  Respondent: 15282625 / Kelly Graves  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY E3 (EMPLOYMENT CAPACITY AND FLOORSPACE):
• Puts unnecessary obstacles in the way of using brownfield land into useful residential housing, contrary to government policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

 Comment ID: PSLPP16/10954  Respondent: 15282625 / Kelly Graves  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT TO POLICY E4 (SURREY RESEARCH PARK):
• Subordinates public planning policy to the University of Surrey’s private, commercial enterprises (not its public academic purpose).
• No cost/benefit analysis of harm to Green Belt involved in extending research park.
• Waters down research purpose of park, turning into a general business park.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10955  Respondent: 15282625 / Kelly Graves  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY E5 (RURAL ECONOMY):
• Incompatible with high housing numbers proposed for rural areas elsewhere in the plan.
• Insetting and settlement boundary extension endanger appropriate rural activities listed that depend on maintaining rural areas’ character.
• Town-centre uses for rural areas contradict government’s localism policy and need to consult and protect village environments.
• Established commitments to high-speed rural broadband and mobile coverage watered down despite 2014 consultation responses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10956  Respondent: 15282625 / Kelly Graves  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY E6 (LEISURE AND VISITOR EXPERIENCE):
• Danger of overdevelopment: success doesn’t depend on building “attractions” which can harm heritage and rural settings. No case made for creating new ones.
• No policy of opposing reduction in rural hotel capacity.
• No definition of what added value interventions by Council can make to normal visitor market mechanisms.
• No policy of supporting Guildford countryside as its prime leisure and visitor asset, whose value rises as London gets
bigger and busier.
• No vision of what the ideal visitor experience of the borough actually is and how to support its various elements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10957  Respondent: 15282625 / Kelly Graves  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY E7 (TOWN CENTRE):
• No statement in policy wording of value of Guildford’s rural setting and views.
• No consideration of Town Centre Master Plan, GVG proposals or station redevelopment plans.
• Proportion of new housing in town far too small. Development pushed into countryside, ruining the latter and harming urban regeneration.
• No brownfield register.
• Too much big retail, despite online shopping revolution and decline of traditional high streets internationally. Futile to try to turn Guildford into Woking or Kingston.
• No measures to support small, niche retailers in town, e.g. through business rates.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10958  Respondent: 15282625 / Kelly Graves  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY E8 (DISTRICT CENTRES):
• Too much scope to expand rural retail centres to justify major housing expansion across the countryside, despite lack of demand. Will spoil character of villages while harming Guildford’s role as a retail hub.
• No measures to support existing rural shops and services, e.g. through business rates.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/10959  Respondent: 15282625 / Kelly Graves  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY E9 (LOCAL CENTRES):
• No need for retail development “adjacent” to rural centres for same reason as Policy E8.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10941  Respondent: 15282625 / Kelly Graves  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY H1 (HOMES FOR ALL):
• Policy doesn’t set any constraints on building.
• Housing mix based on pre-Brexit growth and demographic assumptions and unreliable SHMA that wasn’t put out to formal public consultation and wasn’t scrutinised by Councillors.
• Fails to compel University of Surrey to use its thousands of planning permissions and existing space, such as car parks, for student accommodation.
• Releases University from accommodating its students, so as to free up houses for the most needy in town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10942  Respondent: 15282625 / Kelly Graves  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT TO POLICY H2 (AFFORDABLE HOMES):
• Using the official definition of Affordable is inappropriate - houses in the area are and will remain unaffordable homes - a drive for more homes will just means a drive for more income from development.
• This policy won’t affect market forces or house prices. Guildford is too small and too near London to influence these, however many homes it builds.
  • The viability clause lets developers off the hook of providing even these (non-)affordable homes. Too open to manipulation.
  • Contradicts government policy to develop less advantaged regions of the UK. People don’t have to live and work in Guildford but should be encouraged to move to cheaper, less congested areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10943  Respondent: 15282625 / Kelly Graves  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY H3 (RURAL EXCEPTION HOMES):
• It loosens the criteria by allowing “market housing” and development that changes the housing mix. Developers would be able to override NPPF 2 “exceptional circumstances” and other restrictions to build large houses in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10964  Respondent: 15282625 / Kelly Graves  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY I1 (INFRASTRUCTURE & DELIVERY)
• Infrastructure considered here as an afterthought, rather than pre-condition of development. Should be a key issue for the rest of the plan.
• Excessive housebuilding in countryside not supported by any funding or provision for infrastructure.
• Heavy focus on building on greenfield sites inefficient and unnecessary: cheap for developers but much more expensive for the public who have to fund the infrastructure.
• Draft CIL scale discourages use of brownfield land first.
• No plan for organic increase in existing traffic congestion, let alone once thousands of houses are built across the countryside. Local roads hardly considered. Green Belt being eroded before road widening/improvement plans certain, encouraging over-development of greenfield sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10965  Respondent: 15282625 / Kelly Graves  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY I2 (SUPPORTING DTp’S ROAD STRATEGY):
• Doesn’t allow for catastrophic increase in traffic resulting from spreading new housing estates across the borough.
• Out of sync with DTP’s strategy: houses to be built and Green Belt destroyed before plans for A3 etc implemented.
• Road plans too optimistic anyway, especially post-Brexit. Probably won’t happen.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10966  Respondent: 15282625 / Kelly Graves  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY I3 (SUSTAINABLE TRANSPORT):
• Generic measures, not related to real life or the particularities of Guildford.
• Fails to treat sustainability as a constraint. Assumes excessive levels of development proposed in the plan can be supported by sustainable development.
• Unrealistic. Most people can’t or won’t walk or cycle – commuters in a hurry, the elderly, children, people who are unwell or unfit, people carrying heavy shopping or other goods. I.e. most residents!
• Town’s eye view of transport. Ignores scarcity of existing rural public transport and commercial unviability of increasing it. Ignores terrible state of Surrey’s roads, potholes, flooding etc. Ignores extra stress to be created by huge new housing estates in countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT TO POLICY I4 (GREEN & BLUE INFRASTRUCTURE):
• Policy cancelled out by huge developments across the countryside. No mention of opportunity costs of loss of Green Belt services and amenities (e.g. farming).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT TO POLICY P2 (GREEN BELT):
• No declaration of support for protecting the Guildford Green Belt, contrary to NPPF and government statements.
• No evaluation of value of local Green Belt as a public and private asset: it is simply treated as potential building land with a few inconvenient restrictions.
• Impact of Green Belt development on local agriculture ignored.
• Impact on rural leisure and tourism ignored.
• Impact on flood control ignored.
• Impact on carbon sink and knock-on effects for air pollution and climate change ignored.
• Impact on biodiversity ignored.
• Impact on natural heritage ignored.
• Impact on water catchment ignored.
• Impact on room for public space amenities (parks, cemeteries, waste facilities etc) ignored.
• Impact on rural business (e.g. mineral mining, film making) ignored.
• Impact on natural landmarks and views ignored.
• Harm to public health and wellbeing (physical, psychological) ignored.
• Allows excessive levels of development in breach of views expressed in last consultation and Conservative Party manifesto commitments at the last local elections.
• Has allowed ruling Councillors to argue that there is an acceptable percentage of Green Belt that should be sacrificed to development, when no such rule exists in the NPPF.
• Ignores alternative approaches, such as fair burden-sharing under which settlements would undertake to accommodate new development in proportion to their size.
• Disproportionate amount of development (most of it, in fact) to be in Green Belt. Too few new homes in urban areas where many young people want to live. This will act against much needed urban regeneration.
• Major settlement extensions allow indiscriminate housebuilding, as irregularly shaped villages are squared off to enclose green fields.
• Overall harm to Guildford Green Belt unjustified by any objective development need post-Brexit.
• Ignores most of NPPF 17 stipulations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10968  Respondent: 15282625 / Kelly Graves  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? (), is Sound? (), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY I4 (GREEN & BLUE INFRASTRUCTURE):
• Policy cancelled out by huge developments across the countryside. No mention of opportunity costs of loss of Green Belt services and amenities (e.g. farming).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10945  Respondent: 15282625 / Kelly Graves  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? (), is Sound? (), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY P3 (COUNTRYSIDE BEYOND THE GREEN BELT):
• Gives Ash and Tongham more protection than rest of borough, including existing Green Belt. But they don’t contribute to preventing London sprawl.
• Special treatment of ward represented by current Council Leader and his predecessor. Politically biased.
• A minor extension of Green Belt in one place does not justify its major destruction elsewhere (the inset villages).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10946  Respondent: 15282625 / Kelly Graves  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY P4 (FLOOD RISK AND WATER PROTECTION):
• Limits development of urban, brownfield, hardstanding sites, pushing development unnecessarily into the countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10947  Respondent: 15282625 / Kelly Graves  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY P5 (THAMES BASIN HEATH S.P.A.):
• Compensation mechanism too feeble to provide protection.
• Cynical encouragement of SANG to justify nearby development in protected areas. Does not extend protection or amount of green space, and can damage them (e.g. dog and cat attacks on wildlife).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10939  Respondent: 15282625 / Kelly Graves  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY S1 (SUSTAINABLE DEVELOPMENT):
• No definition given, no reference to its importance in the NPPF, no guidelines for applying it to planning.
• No statement of how economic, social and environmental impacts should be balanced.
• No mention of Green Belt, Guildford’s greatest legacy by far to Sustainable Development. No commitment to protecting it.
• No reference to most of the NPPF Core Planning Principles.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10940  Respondent: 15282625 / Kelly Graves  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY S2 (BOROUGH-WIDE STRATEGY):
• Numbers based on growth and demographic data now invalidated by Brexit.
• No justification given for 13,860 housing figure.
• Figures based on a Housing Market Area that ignores 2 neighbouring districts (Rushmoor and Mole Valley) and is much too small, since most people commute or travel far outside the area to shop or study. This distorts the figures: no reason why Guildford needs to build nearly twice as many large housing estates as the rest of Surrey put together, or half of all sites over 100 units.
• High numbers involved would transform character of the borough from mainly rural/Green Belt to urban, creating a corridor of development out of London as per Woking or Croydon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2494  Respondent: 15282657 / John Peake  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to object most strongly to the proposal to remove Chilworth from the Green Belt. It is surrounded by an AGLV and the AONB and is seen from the hills along the Tillingbourne Valley. This valley is an extremely attractive area within the Borough and it is very important that the villages along it remain as discrete entities and do not coalesce due to ribbon type development. Hence Green Belt protection for Chilworth is essential.

There is a suggestion that 20 dwellings could be built on land at Old Manor Farm, ( Site Ref. 2286 ). This land is outside the Settlement Boundary, is in the Green Belt and in an AGLV, and is also adjacent to a Conservation Area. It is almost surrounded by Public Footpaths. Hence it is important for the openness of the countryside. The side has no adequate, or wide enough, vehicular access. Thus the proposal to build there is entirely inappropriate.

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Tillingbourne Junior School playing fields should remain outside the Settlement Boundary so as to retain their Green Belt protection in the long term. Having been a Governor there for about 30 years I know that the fields are fully utilised but the Governing Body is well aware that many school playing fields have already been sold off.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/604  Respondent: 15282657 / John Peake  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

The house building target of 13,860 dwellings over period 2013 to 2030 must clearly be reviewed following the Referendum result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/622  Respondent: 15282689 / Waitrose Ltd (K Harrison)  Agent: Firstplan (Beverley Bateman)

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

The following comments are submitted on behalf of our client, Waitrose Ltd, in respect of ‘Question 7: Any other comments’.

There are various references in the Proposed Submission Local Plan: Strategies and Sites document to the delivery of the proposed Sustainable Movement Corridor (including in the Spatial Vision, at Policy I3 and in respect of a number of the proposed site allocations). As part of this Sustainable Movement Corridor, the Infrastructure Schedule at Appendix C sets out various alterations and closure of roads within Guildford Town Centre as part of the Guildford Town Centre Transport Package (Ref: LRN1).

Our client, Waitrose Ltd, has recently opened a food store in Guildford. The store is located on the northern edge of the town centre, within close proximity of the primary shopping area. Waitrose would like to take this opportunity to highlight the importance of ensuring that the proposed transport strategy referred to in the Plan does not in any way deter car-borne
shoppers from using the new Waitrose foodstore. Any alterations to the existing road layout in Guildford which make the store less attractive to shoppers could adversely affect the viability of the store – particularly as the store is less than a year old and is therefore yet to become fully established.

In approving planning permission for the store, the Council recognised the ‘great potential’ it has for facilitating linked trips to other town centre facilities. The new Waitrose store therefore plays a vital anchor role in supporting the vitality and viability of the wider town centre. The proposed Guildford Town Centre Transport Package should not undermine this role by making the store less attractive to those visiting the site by car as this may in turn harm the health of Guildford town centre.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

We are living in Cobbetthill road and we strongly object against the proposal to build over 1100 houses and a secondary school on two sites in Normandy and Flexford.

Already at the moment, Cobbetthill road is being used as a shortcut - cars are continuously speeding and this will increase dramatically if the build of proposed 1100 houses and a secondary school on two sites in Normandy and Flexford goes ahead.

Furthermore, the bottom of Cobbetthill road is at times subject to flooding - which also affects the already busy traffic. Again in case the build of proposed 1100 houses and a secondary school on two sites in Normandy and Flexford goes ahead the traffic will be horrendous.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID:</th>
<th>PSLPS16/1244</th>
<th>Respondent:</th>
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<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Introduction</td>
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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? (Yes), is Sound? (No), is Legally Compliant? (No)

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to object to the removal of the Greenbelt status around the villages including West Horsley due to its piecemeal redevelopment nature.

The sites do not properly provide for sustainable redevelopment and the removal of Greenbelt removes farm land.

To remove the Horsleys from the Greenbelt exceptional circumstances need to be provided this has not been done

No sound reasons have been provided to extend the boundaries.

I do accept and support where it can be proved sustainable and developers pay for infrastructure, schools, transport upgrades that new villages such as Wisley, and Gosden Hill Farm be allowed, these settlements must be over 1500 units and sustainable (no drain on existing services) within their own right and developers pay a 10 year service charge on account to ensure doctors surgeries, buses and schools, sewage systems etc are maintained.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/1254</th>
<th>Respondent: 15282785 / Timothy Pay</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? (No), is Sound? (No), is Legally Compliant? (No)

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the plan in relation to the proposals in A46. As a general overview it is a huge development that will destroy the local area in terms of environment, lifestyle and infrastructure. This proposal cannot be sound as it cannot be justified or delivered. Normandy is a small village of mainly bungalow style buildings. To add 1100 houses, shops and potentially a large secondary school would completely change the area from its current village feel to be a town. This is all proposed on a location that is within 800m of the Thames Basin Heath Special Protection Area and therefore all the protection that has been afforded the area has been disregarded by this part of the local plan.

The main and most worrying impact of the proposed development that cannot physically be addressed is the impact of all the extra traffic that will be generated by building 1100 homes and associated unwanted/unrequired shops and schools. This is also how the plan falls down in terms of its legal obligations. As far as I am aware Surrey County Council has not published a transport strategy and therefore it has not been considered when proposing this disproportionately sized development. The road system as it stands at the moment cannot cope with the current levels of traffic that feed from Aldershot towards Guildford and London. The A31 is always at a standstill for miles in the rush hours and therefore the roads that feed into them, Westwood Lane, the A323 will become gridlocked even further as a result. The thousands of homes being built in Aldershot on the site of the old army barracks will no doubt add to this traffic jam and as a result of this the pollution caused by thousands of cars idling in queues will cause a health risk to the residents. This is a failing
on the plans duty to cooperate as they have not engaged with Rushmoor council to manage the extra traffic that will be
carried when the 4000 houses currently under construction are finished.

Wyke primary school sits on the junction of Guildford Road and Westwood Lane and the health and safety of the children
has not been considered by those planning A46. The children will be at danger from increasing numbers of cars passing
through the area at drop off time and the air pollution will spike at this pinch point right at the corner of a busy road and
oversized development.

Having watched the video 'What the draft local plans means to local people' I was hoping to find a balanced argument for
and against from broad section of local residents. Instead the views were only expressed by those who stand to gain from
the proposals, ie management at the hospital and University in Guildford. I would be amazed if any of the people
interviewed were residents of the affected area of Normandy and facing the complete destruction of its character. I only
moved to Normandy in January 2016 paying a premium to move from the urban environment of Ash to ensure that my two
young daughters are brought up in a pleasant, safe and friendly environment. The charm of Normandy is that being a small
village the atmosphere is one of neighbourhood, people are genuinely friendly and approachable. Children play in the
streets with no fear of crime. If the proposal is agreed then it is inevitable that the standard of living will decrease and
safety in terms of road collisions and crime will increase. Nobody who lives in Normandy wants this development to go
ahead.

I object in the strongest possible terms to A46 being implemented. It is completely disporportionate in its size to the
current village and will irrevocably destroy large swathes of countryside through urbanisation and traffic pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1245  Respondent: 15282881 / Peter Palmer  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is
Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A46 is too much!

It's turning Normandy from a village into a town, and sacrificing too much precious green belt.

We do need affordable houses for first time buyers so I'm in favour of enlarging the village housing stock by 10%.
But this proposal is simply an imposition too far.
As a resident of West Horsley I write to you to object to aspects of the Guildford Borough Proposed Submission Local Plan (Reg 19) 2016 draft which is currently under public consultation.

Having reviewed the submitted document, I am very concerned at the potential implications for the rural village of West Horsley, and challenge the following key points:

1. A) Policy P2: Removal (‘insetting’) of the village from the Green Belt

   - This policy directly contradicts the government’s objective in the NPPF to “assist in safeguarding the countryside from encroachment”, and that “once established, Green Belt boundaries should only be altered in exceptional circumstances”. Normal population growth does not constitute exceptional circumstances which would justify removal of Green Belt status with the associated loss of rural character of the village.

   - Under the NPPF policy #86, “If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt.”

   West Horsley strongly meets these criteria, being characterised by low housing density, open countryside views and bordering directly onto both National Trust and AONB lands, and should remain in the Green Belt with its existing boundaries intact.

   The policy as it stands seeks to justify excessive development in areas where it simply cannot be justified - with an inequitable distribution of over 8000 homes proposed to be built within the Green Belt compared with only 1135 in urban Guildford, it will destroy the character of the countryside and eliminate green space that should be protected in perpetuity.

1. B) Expansion of the village settlement boundary vs Local Plan 2003

   - The current proposed expansion of the settlement boundary vs LP 2003 would remove additional undeveloped green spaces from the Green Belt, rapidly hastening village expansion and encroachment on the neighbouring countryside. There is no supportive basis for this expansion which contradicts the NPPF policy that local planning authorities should “define boundaries clearly, using physical features that are readily recognisable and likely to be permanent” and the above government objective to safeguard the countryside from encroachment.

   - I want to specifically highlight the area to the east of The Street currently outside the settlement boundary, including the Village Green and neighbouring undeveloped land which contributes to the village’s rural character, which would not be best served by being included in the settlement.
I challenge the village expansion as a whole and the area of the West Horsley Village Green/neighbouring fields specifically

1. C) Strategic Site Allocations (A38-41)

- 445 houses are proposed on four ‘strategic sites’ within West Horsley in addition to an undefined number of ‘windfall’ small site completions. Excluding the large site at Normandy, this represents 50% of the total proposed housing within inset villages despite representing only 20% of the current population.

- The proposal places a disproportionate burden of future housing provision on West Horsley relative to other villages, the impact of which would be a significant loss of village character and stress on amenities and roads which could be better addressed through a broader distribution of strategic sites across the borough.

  - The need for so many houses to be built in West Horsley over the first 5 years of the Plan period 2018 to 2033 is totally unproven. The West Horsley Parish Council and Surrey Community Action Housing Survey: May 2014, identified a limited need for some 20 affordable homes for local people who want to remain in the village, i.e. for young people and for elderly people who wish to downsize to a smaller home.

In closing, I fully recognise the need for sustainable housing development within the borough to meet the current and future needs of its residents, but believe we must do so while also safeguarding our countryside and the rural nature of the villages which make this area unique.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2505  Respondent: 15282977 / Tom Davies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy S1. It runs roughshod over the principles and legacy intended by the Green Belt concept by failing to protect them, and ignores most of the 12 Core Planning Principles set out in the National Planning Policy Framework (para 14).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6999  Respondent: 15283009 / Paul Hart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed A46 strategic site at Normandy / Flexford for the following reasons:

1. 'Exceptional circumstances' for the removal of this site form the metropolitan green belt have not been demonstrated. The need for a new secondary school on the site is not an 'exceptional circumstance' to justify removal. The relationship between new dwellings and a new secondary school on the site is circular, thereby annulling the 'exceptional circumstance' argument. There is no proven need for a secondary school on this site at the expense of other alternatives which do not require the removal of land from the metropolitan green belt. GBC have not demonstrate that a combination of i) utilising under subscription to schools in the west of the borough ii) additional place from the already commited new Technical College and Hoe Valley school and iii) further development of existing schools would be a satisfactory alternative to the proposed secondary school on the A46 site.

1. This assessment has been enabled by inappropriate application of the NPPF concepts of sensitivity and sustainability in the decision to remove the site from the metropolitan green built. Sensitivity considerations have been minimised and sustainability claims have been exaggerated for the following reasons i) The settlements of Normandy and Flexford have been treated as separate for the purpose of sensitivity, but treated as as one for the purposes of sustainability. This has driven a different assessment of the site than if treated consistently across both concepts ii) mitigation to the threat to the Thames Basin Health Special Protection Area has not been demonstrated in the current plan - urbanisation will negatively impact on the the TBHSPA as a result iii) ecological networks and priority habitats under the NERC are not satisfactorily protected with the removal of the site from the metropolitan green belt iv) important views of the village (both daytime and nighttime) from the surrounding AONB landscpae will not be protected by the urbanisation of the village v) there is no evidence to demonstrate that an estate development such as this will encourage significant retail and employment opportunities to offset the sensitivity considerations.

1. The ability to deliver the required improvement in local infrastructure has not been demonstrated. Key concerns are i) the removal of the environmental agency identified flood plain 3b without adequate improvement to the GBC surface water Management Plan ii) the inability of the unclassified roads surrounding the site to deal with the increased traffic from both the A46 site and also incremental traffic from Rushmoor Council's nearby house expansion iii) the as yet unfunded water supply and sewerage improvements that are required to deliver the site.

1. There has been no 'meaningful engagement' with local residents as is expected under the NPPF. Residents had been working on the assumption that this site would be a 'safeguarded site' per the 2014 draft local plan until GBC notified us of the change new proposal in April 2016.Sensitivity considerations have been minimised and sustainability claims have been exaggerated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
4.6.24 appears to be the only reference made to new railway stations. My interest is in obtaining a railway station at Park Barn (Guildford West). I know that the success in achieving such a station depends on discussions with Network Rail but I feel a commitment to make every reasonable possible effort should be clear in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Limited infilling seems to enable development in green belt without the need to inset. I feel this causes confusion - it would appear that the way to enable development is to inset (i.e. remove some land from the green belt). A concept which allows development in what remains green belt (which is what limited infilling seems to do) is both confusing and also dangerous in that it devalues the green belt. Insetting is controvertial, especially if widespread and escalating - I believe it should only be done if entirely necessary and I suspect and hope that those with particular interest in individual areas have commented on the proposed insetting. My particular point here is about the alternative, and in my view unhelpful, concept of limited infilling.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I very much welcome a public consultation on the Local Plan - I understand not all local authorities undertake such a consultation and I am aware that often when public bodies consult the public there is a problem with inclusivity so my comment here is not a criticism of Guildford Borough but a very strong suggestion for the next Local Plan or even for this one if it can be delayed to allow the change I suggest to be incorporated, as follows. A consultation should be a meaningful one in that it is equally accessible to all people in the public. The (understandable) complexity of the Plan documentation and the feedback method requiring free text typing will inevitably discourage many from participating. A very simple executive summary of what the Plan is (and one for each section too) with an even simpler listing of key actions (which are those considered to be ones that the public may have differences of opinion on) which can be given drop-down menus for options from which members of the public can chose their preferred approach. More participation can be encouraged by way of a welcoming, user-friendly front page signposting a click to the summaries and the key actions options perhaps contained in a simple (perhaps 20 minutes) questionnaire which could be so simple it could lend itself to being advertised elsewhere too (e.g. Surrey Advertiser). One very simple illustration of the uncertainty of the current version of the consultation is that, while saving the comments (including this one), an individual is left feeling the response may not be what is of interest to the surveyor, may not be given due consideration and, further, he/she may even be uncertain if he/she has participated in the consultation at all without a 'submit' button. In order for a public consultation to be a true, wide-reaching and hence democratic consultation, it should be based on such simple questions and potential (defined) responses that the respondent will know that his/her response has been entered/received, understood and will be given the appropriate (equal) weight as others.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1267  Respondent: 15283073 / Natasha France  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( No ), is Legally Compliant? ( Yes )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed sites at A43, A43a and A35.

Site A35 is totally unsustainable - it is totally car dependant, needs and relies upon outside funding for up grading of junction 10 and also requires site A43 to pay for the junction improvements at A43a so that the traffic impact that it will create is mitigated. A43 is not a good site in its own right it is proposed simply to mitigate the trafic impact of site a35. It is surley plain stupid to allow circa 5000 units to be developed with approximately 3 miles of each other all relying upon A3 improvements!

Guildford and a lot of the south east relie upon the A3. Why are we also placing so much pressure on it (the a3) to also make housing acceptable.

So much of this plan relies upon the A3 working and being paid for by central government. It is not a credible 5 yr plan. I object.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2527  Respondent: 15283073 / Natasha France  Agent:
I object. The plan relies on outside funding to make sites acceptable. I do not believe that the plan can deliver housing and infrastructure in a timely fashion as the outside funding is not guaranteed. For example, if funding is not made available or is delayed for junction 10, the Wisley godston hill and Godston are simply unacceptable.

Why have over half of the plans sites been allocated in the north of the borough all requiring the A3 and M25 to be improved with funding from outside and none guaranteed sources. In fact this plan can not deliver in the short to medium term. I object. Moreover, it would seem to me that the Godston site at Garrick arch is only included as a site to make the Wisley site acceptable in transport term:

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/4502  Respondent: 15283105 / Chris Woods  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/8200  Respondent: 15283105 / Chris Woods  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
• I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

• After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

• I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

◦ I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

◦ I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

◦ I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

◦ I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

◦ I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Policy D4 implies that the occupants of buildings should continue to be able to enjoy the amenities. This would be best stated explicitly. It is fundamental to there being "no unacceptable effect on the amenities in terms of privacy, noise, vibration, pollution, dust, smell and access to sunlight and daylight."

For the proposal for East Horsley I object in that there would be a reduction in the enjoyment of amenities by the occupants of buildings due to:

1) Local medical facilities being stretched already
2) Roads are narrow and clogged during peak periods
3) There is no plan to change those roads to ease congestion
4) Insufficient car parking in the community and shopping areas for the intended additional residents. This would be exacerbated if the Wisley Airfield draft plan is actioned.
5) Various roads in East Horsley have no, or narrow footpaths. Increasing the local population will increase the chances of accidents

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/18451  **Respondent:** 15283105 / Chris Woods  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**
• I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18452  Respondent: 15283105 / Chris Woods  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/636  Respondent: 15283105 / Chris Woods  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Continuing to add residents to a borough or an area such as Guildford because of demand will, incrementally, change the nature of Guildford borough and make it less desirable to its residents. The roads and Guildford itself are already crowded, the intended road plans will not alleviate all of the congestion. Congestion will become incrementally worse than increment in traffic and people as adding to queues compounds the problem. Reducing desirability of Guildford cannot be an objective, although it will result from following the draft local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1262  Respondent: 15283137 / Andrew Tate  Agent:
The Hogs Back is a wonderful resource for local people and forms part of London’s Green belt. Site A26 Blackwell Farm is set to change this and puts under threat the sanctity of the Hogs Back with the massive housing development threatened here. It will be so visible from the top of the Hogs Back when walking, riding, cycling or even in a car as you look north. Presently there is a green lung separating this lovely area from the development associated with Aldershot, Camberley, Woking (all visible in the distance).

Build on brownfield sites first - that should be the policy not over 3,000 houses on this AONB.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

The Green Belt is a vital part of the British way of life and I object to any loss of this important facility.

The existing Sewage works is already not coping properly with the existing demand, often making the River Wey very smelly near its outlets, plus causing foul odors at Slyfield and other residential areas, including Burpham. This must be addressed before more building work is done.

What about schools? Extra places must be provided in time to accommodate the many more children in the new developments. Has this been addressed?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the 2016 Draft Local Plan.

I live in Burpham, very close to the A3 and the traffic is already extremely heavy, often coming to a complete standstill. Building the proposed number of new homes in Burpham, Slyfield, Ripley, Send, Clandon, etc. all close to the A3 and Guildford will mean movement of traffic will become much worse. Guildford already becomes gridlocked when the A3 or the A25 is extra slow. I suggest better road facilities should be decided and developed before more development is undertaken.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1268  Respondent: 15283745 / G Doven  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to register my objection to the GBC Local Plan affecting Normandy and Flexford and give the following reasons;

1, The plan as it stands appears to be developer led without any thought of the local community that the GLC is in place to serve.

2, There appears to be no consideration given or respect to the high quality green belt status currently in place.

3, Normandy and Flexford is a rural environment and is served with a rural environment infrastructure unsuited to major development.

4, The planned development does not take into account that it is surrounded by country lanes, Glaziers Lane and Westwood Lane both of which are used as rat runs when the Hogs Back is at a standstill which is a regular occurrence and both of which are unsuited to developer and additional resident traffic.

5, Drainage and sewage facilities are barely able to manage with the current demands in place and flooding is an additional problem yet to be resolved.

6, The Guildford road that flanks the northern perimeter of the proposed development is currently at or very near full capacity with traffic volumes that frequently restrict access from Glaziers and Westwood lanes.

7, The proposed development is of size that is more suited to the convenience of GBC than the residents of Normandy and Flexford. A number of smaller developments distributed throughout the area would be more in-keeping with the rural environment,
8. There is no identifiable requirement for a new school as part of any new development in Normandy and Flexford as it has been confirmed that local schools in the area all have spare capacity and the will to expand their current capacities if required in the future.

9. The proposed development would build over areas much valued by local residents for dog walking, rambling and leisure activities.

10. The current plan is unsustainable, unsuitable and against the wishes of the local community.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/1269  **Respondent:** 15283777 / Christine Doven  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

**Do you consider this section of the document; complies with the Duty to Cooperate? ()**, **is Sound? ( )**, **is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I would like to register my objection to the GBC Local Plan affecting Normandy and Flexford and give the following reasons;

1. The plan as it stands appears to be developer led without any thought of the local community that the GLC is in place to serve.

2. There appears to be no consideration given or respect to the high quality green belt status currently in place.

3. Normandy and Flexford is a rural environment and is served with a rural environment infrastructure unsuited to major development.

4. The planned development does not take into account that it is surrounded by country lanes, Glaziers Lane and Westwood Lane both of which are used as rat runs when the Hogs Back is at a standstill which is a regular occurrence and both of which are unsuited to developer and additional resident traffic.

5. Drainage and sewage facilities are barely able to manage with the current demands in place and flooding is an additional problem yet to be resolved.

6. The Guildford road that flanks the northern perimeter of the proposed development is currently at or very near full capacity with traffic volumes that frequently restrict access from Glaziers and Westwood lanes.

7. The proposed development is of size that is more suited to the convenience of GBC than the residents of Normandy and Flexford. A number of smaller developments distributed throughout the area would be more in-keeping with the rural environment,

8. There is no identifiable requirement for a new school as part of any new development in Normandy and Flexford as it has been confirmed that local schools in the area all have spare capacity and the will to expand their current capacities if required in the future.
9. The proposed development would build over areas much valued by local residents for dog walking, rambling and leisure activities.

10. The current plan is unsustainable, unsuitable and against the wishes of the local community.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2538  Respondent: 15283969 / Phil Ballance  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We live in New Inn Lane and are writing to object to the 2016 Draft Local Plan. Guildford is becoming grid locked at certain times of the day as it is due to the volumes of traffic and the inadequate infrastructure.

The other day or took me nearly an hour to drive from Burpham to Royal Surrey Hospital at 5pm to pick my wife up from work. Every morning and evening Guildford almost stops so to even consider building 2,000 new homes which means at least 4,000 additional cars on the road without massive investment in the roads, seems madness.

We, along with 300 others objected to the building of Aldi in Burpham due to increased traffic and again the council did not listen and this has made the area a lot worse. You cannot park in Kingspost parade at certain times due to Aldi customers using it as an overflow car park, something that was not even considered as part of the planning approval.

The houses that were built in Raynham Close provided inadequate parking, as all new housing developments seem to these days and therefore you now have a parking problem in Burnet Avenue.

The bottom line is there are far too many houses and cars in Burpham without building anymore and a new railway station will compound the problem not solve it.

The strategy to cram as many houses into an existing area is not a plan, it's purely focusing on meeting government targets rather than what is best for the long term good of the area. Unless the problem is dealt with in a sensible planned way you will just create more problems down the line which is where this is heading.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPA16/751  Respondent: 15284225 / Colin Squance  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Chilworth
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It is appreciated that we have to accept additional housing in the Guildford area, the amount of which is still to be justified, but there are still plenty of Brown sites and infilling available for consideration without removing the protection against development offered by the Green Belt.

In particular I object to the removal of the Green Belt in the Chilworth / St Martha area where there are historic areas of outstanding natural beauty and Scientific Interest which in their existing environment add to the special nature of this particular part of the Guildford area. The area of Chilworth / St Marthas should not be damaged or reduced by development but should remain intact for the enjoyment of everyone, visitors and residents alike.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/754  Respondent: 15284321 / Adam Hodgson  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Shalford (south)

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to register my objection to the proposed changes to the local plan affecting the green belt boundary within Shalford Village specifically the exclusion of the fields behind Shalford Village Hall, proposals that will lead to the increased threat of the development of the land which will have a significant negative effect on the village.

As a resident of Kings Road, we have had 2 serious accidents recently (within the last 3 months) outside my house and the fact that both did not result in serious injury is purely down to chance. The volume of traffic using Kings Road and most importantly travelling at **serious excess speed** is reason enough to demand that the threat of further increased volume of traffic be removed.

I would seriously ask you to look at drastic road traffic calming measures through the village and would suggest that time spent doing this would be **time well spent** rather than looking at ways of destroying the village by turning its green belt land into house developments. There are plenty of unused brown field and non-green field designated sites you could target within the Guildford Borough rather than just picking on soft targets like Shalford Village.

I object to your proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2547  Respondent: 15284353 / Anne and Ejgil Olesen  Agent: 

Page 1077 of 2804
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to the plan

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/986  Respondent: 15284353 / Anne and Ejgil Olesen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/756  Respondent: 15284385 / T.W. Turnill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Normandy and Flexford

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Submission Local Plan – Normandy

I wish to OBJECT most forcibly with the proposed development in Normandy between Westwood Lane and Glaziers Lane. My reasons for objection are as follows:- Inadequate Infrastructure, especially the lack of suitable roads; flooding and Sewage problems leading to Health considerations; The Spurious “Need for a Secondary School”; The Impact on the Environment; The use of Red notated agricultural land Not safeguarded, and in the Green Belt for building 1100 houses; The lack of local consultation with GBC to discuss the desires of the Village, in line with the Governments declared policy of the need to ensure that the village actually WANTS the extra housing. I will expand on each.

1. Inadequate Infrastructure.

I refer primarily to the effect 1100 extra houses, each with a probable two cars, will have on the local traffic situation, which is already creaking. Both Westwood Lane and Glaziers Lane are country roads, each having dangerous bridges associated with the railway line. These roads are on the borders of the planned development, while the northern edge is bordered by the A323, which is already extremely busy at peak times. The addition of a 1100 pupil Secondary School on that road will increase the traffic intolerably, when taken in addition to the cars from the new development trying to reach Guildford or Aldershot.

Whenever there is an accident on the Hogs Back or A3, traffic tries to exit via Wanborough Hill to use either of the two lanes, neither of which is capable or designed to take that volume of traffic. Anyone who tries to access the A31 at peak traffic times from either the Puttenham or Wanborough directions will know how long the queues are, and the potential for accidents for traffic leaving the A31 at the Puttenham turn off. This could severely jeopardise Emergency traffic trying to access the new development, whose road structure might well be not capable of allowing Fire and Ambulance vehicles to attend an emergency, especially during peak traffic times.

1. Flooding and associated Sewage Problems.

Parts of Normandy, especially at the southern edge of the proposed development and in the area next to the Hoe stream, are subject to severe flooding problems, and the associated release of sewage into people’s properties and into the Hoe stream which would cut across the development. One property has already been flooded 5 times in the past year, and the Station Car Park is regularly flooded during the downpours which have been occurring regularly. The Hoe stream also floods, which affects Glaziers Lane at the bridge crossing the stream, and sewage has been released into it, causing a health hazard.

The proposed development area at present allows natural drainage through the soil and trees; if this area is concreted over, the resultant run off of surface water would overwhelm the present system, causing even more flooding in the local area. I am not convinced that an underground tank to take excess water and release it in a controlled fashion would be able to cope with the increased amount of water which forecasters say we must expect with climate warming.

1. The “Need” for a Secondary School

We have been told that there is a need for a secondary School to the West of the County. The County Councillor for Normandy has consulted ALL the local schools, and their Heads have all confirmed that their own schools are undersubscribed, and would be able to accommodate any increase in pupil numbers with no difficulty. We have been told by Councillor Spooner that the main advantage of having the school in Normandy would be that the proposed Developer would build it for free, providing they were in turn allowed to build the 1100 houses on the Green Belt Land. The School is NOT required, and therefore the argument for the houses disappears with it.

1. Environmental Impact

The village of Normandy lies within an area of outstanding natural beauty close to the Surrey Hills to the South and the Army Heathland to the North. It provides a welcome rural break between the towns of Aldershot and Guildford, and is in designated Green Belt. It features a wide range of wild life, including many endangered and protected species, and the addition of 1100 households, with their associated cats, would decimate much of the wild life that lives here. In addition, the replacement of the present agricultural land with housing would remove a valuable habitat for all the wild creatures that have come to rely on the peaceful nature of the area.
1. The use of non-safeguarded Agricultural Land for Building.

The area proposed for building 1100 houses is Green Belt, designated Red agricultural land, which has been constantly used for grazing and livestock. The Government has repeatedly said that such land should NOT be used for building, unless there were overwhelming requirements to do so. These requirements have not been shown to exist in this village.

1. Legal aspects.

Guildford Borough Council, unlike the other Surrey Councils, insists that there is a requirement for double the number of houses in this area compared with theirs. That estimate was provided by a firm which refuses to disclose how it came to that conclusion on the grounds of “commercial sensitivity”. Thus, the Council has no way of verifying how accurate this estimate is, or what assumptions were used in coming to this figure. It is imperative that this arbitrary figure be challenged, and another firm used who will be transparent in the assumptions it makes, so that a proper estimate can be used.

In summary, and in view of the points I have made above, I would be grateful if you would log my strong objections to the proposal to build 1100 houses between Glaziers Lane and Westwood Lane in the village of Normandy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1186  Respondent: 15284385 / T.W. Turnill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Normandy and Flexford

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to OBJECT most forcibly with the proposed development in Normandy between Westwood Lane and Glaziers Lane. My reasons for objection are as follows:- Inadequate Infrastructure, especially the lack of suitable roads; flooding and Sewage problems leading to Health considerations; The Spurious "Need for a Secondary School"; The Impact on the Environment; The use of Red notated agricultural land Not safeguarded, and in the Green Belt for building 1100 houses; The lack of local consultation with GBC to discuss the desires of the Village, in line with the Governments declared policy of the need to ensure that the village actually WANTS the extra housing. I will expand on each.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2175  Respondent: 15284385 / T.W. Turnill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The area proposed for building 1100 houses in the Green Belt, designated Red agricultural land, which has been constantly used for grazing and livestock. The Government has repeatedly said that such land should NOT be used for building, unless there were overwhelming requirements to do so. These requirements have not been shown to exist in this village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2899  Respondent: 15284385 / T.W. Turnill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We have been told that there is a need for a secondary School to the West of the County. The County Councillor for Normandy has consulted ALL the local schools, and their Heads have all confirmed that their own schools are undersubscribed, and would be able to accommodate any increase in pupil numbers with no difficulty. We have been told by Councillor Spooner that the main advantage of having the school in Normandy would be that the proposed Developer would build it for free, providing they were in turn allowed to build the 1100 houses on the Green Belt Land. The School is NOT required, and therefore the argument for the houses disappears with it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4627  Respondent: 15284385 / T.W. Turnill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I refer primarily to the effect 1100 extra houses, each with a probable two cars, will have on the local traffic situation, which is already creaking. Both Westwood Lane and Glaziers Lane are country roads, each having dangerous bridges associated with the railway line. These roads are on the borders of the planned development, while the northern edge is bordered by the A323, which is already extremely busy at peak times. The addition of a 1100 pupil Secondary School on that road will increase the traffic intolerably, when taken in addition to the cars from the new development trying to reach Guildford or Aldershot.

Whenever there is an accident on the Hogs Back or A3, traffic tries to exit via Wanborough Hill to use either of the two lanes, neither of which is capable or designed to take that volume of traffic. Anyone who tries to access the A31 at peak traffic times from either the Puttenham or Wanborough directions will know how long the queues are, and the potential...
for accidents for traffic leaving the A31 at the Puttenham turn off. This could severely jeopardise emergency traffic trying to access the new development, whose road structure might well be not capable of allowing Fire and Ambulance vehicles to attend an emergency, especially during peak traffic times.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/4639  **Respondent:** 15284385 / T.W. Turnill  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

The village of Normandy lies within an area of outstanding natural beauty close to the Surrey Hills to the South and the Army Heath land to the North. It provides a welcome rural break between the towns of Aldershot and Guildford, and is in designated Green Belt. It features a wide range of wild life, including many endangered and protected species, and the addition of 1 100 households, with their associated cats, would decimate much of the wild life that lives here. In addition, the replacement of the present agricultural land with housing would remove a valuable habitat for all the wild creatures that have come to rely on the peaceful nature of the area.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/4633  **Respondent:** 15284385 / T.W. Turnill  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

Parts of Normandy, especially at the southern edge of the proposed development and in the area next to the Hoe stream, are subject to severe flooding problems, and the associated release of sewage into people's properties and into the Hoe stream which would cut across the development. One property has already been flooded 5 times in the past year, and the Station Car Park is regularly flooded during the down pours which have been occurring regularly. The Hoe stream also floods, which affects Glaziers Lane at the bridge crossing the stream, and sewage has been released into it, causing a health hazard.

The proposed development area at present allows natural drainage through the soil and trees; if this area is concreted over, the resultant run off of surface water would overwhelm the present system, causing even more flooding in the local area. I am not convinced that an underground tank to take excess water and release it in a controlled fashion would be able to cope with the increased amount of water which forecasters say we must expect with climate warming.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/4648  **Respondent:** 15284385 / T.W. Turnill  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Guildford Borough Council, unlike the other Surrey Councils, insists that there is a requirement for double the number of houses in this area compared with theirs. That estimate was provided by a firm which refuses to disclose how it came to that conclusion on the grounds of "commercial sensitivity". Thus, the Council has no way of verifying how accurate this estimate is, or what assumptions were used in coming to this figure. It is imperative that this arbitrary figure be challenged, and another firm used who will be transparent in the assumptions it makes, so that a proper estimate can be used.

In summary, and in view of the points I have made above, I would be grateful if you would log my strong objections to the proposal to build 1100 houses between Glaziers Lane and Westwood Lane in the village of Normandy.

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**Comment ID:** pslp173/191  **Respondent:** 15284385 / T.W. Turnill  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Normandy and Flexford

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

While I am extremely happy to see that Sites A46 and A47 have been removed from the local plan, I am concerned about the removal of Green Belt status for some of Guildford Road and Glaziers Lane. This removal would allow development out of keeping with the rest of the village, and encourage developers to re-apply for greater development on Sites A46 and A47.

Because of the danger of this, I wish to OBJECT most forcibly to any future major development in Normandy. My reasons for objection are as follows:- Inadequate Infrastructure, especially the lack of suitable roads; flooding and Sewage problems leading to Health considerations and The Impact on the Environment

1. Inadequate Infrastructure.
The local traffic situation is already creaking. Both Westwood Lane and Glaziers Lane are country roads, each having dangerous bridges associated with the railway line. These roads are on the borders of the previously planned development, while the northern edge is bordered by the A323, which is already extremely busy at peak times. The effect of the planned addition of 10,000 new homes within a ten mile radius of Normandy on that road will increase the traffic intolerably, for those cars trying to reach Guildford or Aldershot.

Whenever there is an accident on the Hogs Back or A3, traffic tries to exit via Wanborough Hill to use either of the two lanes, neither of which is capable or designed to take that volume of traffic. Anyone who tries to access the A31 at peak traffic times from either the Puttenham or Wanborough directions will know how long the queues are, and the potential for accidents for traffic leaving the A31 at the Puttenham turn off. This could severely jeopardise Emergency traffic trying to access the local villages.

2. Flooding and associated Sewage Problems.

Parts of Normandy, especially at the southern edge of the previously proposed development and in the area next to the Hoe stream, are subject to severe flooding problems, and the associated release of sewage into people’s properties and into the Hoe stream which would cut across the previously proposed development. One property has already been flooded 5 times in the past years, and the Station Car Park is regularly flooded during the downpours which have been occurring regularly. The Hoe stream also floods, which affects Glaziers Lane at the bridge crossing the stream, and sewage has been released into it, causing a health hazard.

The previously proposed development area at present allows natural drainage through the soil and trees; if this area were to be concreted over, the resultant run off of surface water would overwhelm the present system, causing even more flooding in the local area. I am not convinced that an underground tank to take excess water and release it in a controlled fashion would be able to cope with the increased amount of water which forecasters say we must expect with climate warming.

3. Environmental Impact

The village of Normandy lies within an area of outstanding natural beauty close to the Surrey Hills to the South, and the Army Heathland to the North. It provides a welcome rural break between the towns of Aldershot and Guildford, and is in designated Green Belt. It features a wide range of wild life, including many endangered and protected species, and the previously proposed addition of 1100 households, with their associated cats, would decimate much of the wild life that lives here. In addition, the replacement of the present agricultural land with housing would remove a valuable habitat for all the wild creatures that have come to rely on the peaceful nature of the area.

4. The use of non-safeguarded Agricultural Land for Building.

The area that was proposed for building 1100 houses is Green Belt, designated Red agricultural land, which has been constantly used for grazing and livestock. The Government has repeatedly said that such land should NOT be used for building, unless there were overwhelming requirements to do so. These requirements have not been shown to exist in this village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4864  Respondent: 15284385 / T.W. Turnill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/757  **Respondent:** 15284513 / Diana Hansford  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Effingham

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I am writing in reference to the local plan for housing development in Effingham and in particular to the revision of its settlement/ inset boundary as detailed on page 338 of the local plan.

I am objecting to the revision of the inset boundary to include those areas marked in yellow.

In particular:

1. the amenity land at rear of Middle Farm Place is designated open space and there is no need to include it in the settlement as this increases the 'craw' of the village westwards.
2. the land immediately behind the houses in Middle Farm Close has no access is part of the conservation area and is adjacent to farm land .

4/5. The inclusion of this land enables the urban 'crawl' westwards as stated above. Regarding the proposed allocation of the Barn (no 4) for housing, this is a barn of historic interest and from an access feasibility point of view can only accommodate a max of 5-7 residences. Any site allocation for such purpose should reflect a proper feasibility assessment on highway grounds.

In terms of land which could be accommodated within the settlement which at present are not, are the lands shown edged blue. These lands are in the main already developed and are intrinsic to the village configuration, particularly St Lawrence school and the Red House and British Legion. The only potential issue is the vacant land known as Lyons Field adjacent to the school, which is a natural extension to the village boundary and is arguably infill in any event, being bordered on 3 sides by development and on the other by the school playing fields .

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
I am writing to make known my objections to the local development plan that is currently under consideration. I feel very strongly that the plan will impact negatively our village in terms of safety, quality of life, and environmental reasons. Specifically, I object as follows:

1. I object that the Green Belt will be compromised by this plan. The area between Woking and Guildford needs preserving so that there is an area of countryside separating them to prevent the sprawl of development for us, and future generations.

2. I object that the tranquil area of the Green Belt at Send should be preserved so that residents of Woking and Guildford, and indeed our village, can enjoy the benefits of the beautiful countryside and all the benefits that being around nature brings to them. We moved to this area a year ago in the understanding that we were to be living in certain environment. We paid a premium to live here and now that way of life, and investment are at risk.

3. I object to the proposed new interchange onto the A3 at Burnt Common. This increase in traffic along the A247 would be disastrous. This road is a minor road really and is already congested much of the time. Trying to cross this road with children, dogs, or indeed for my neighbour who is frail, is a nightmare even with the traffic we have now.

4. I also object to the development plan as this would increase traffic along our road, Potters Lane, and this is a major safety issue. People leave the A3 and many speed along our road, which is supposed to have a 30 mile an hour limit where we live. At the A3 end of Potters lane, it is very narrow and it is very dangerous with cars and big lorries coming at speed after leaving a major highway and finding themselves on a minor, twisting country lane. Traffic entering Send Hill at Potters Lane is problematic too. It is a very narrow lane and cannot tolerate more traffic. At the New Inn end of Potters Lane, residents have to park on the road leaving only one lane for traffic to pass one another. Huge lorries find themselves here and have to go up on to the pavement putting pedestrians, including the elderly, the frail and disabled, dogs, and property at risk. The Potters Lane exit from the A3 should be closed. It is dangerous.

5. I object to the development at Send and Garlick’s Arch for a large number of houses and industrial development. There was hardly any notice of the inclusion of this. This area also is a site of ancient woodland and as such is a very precious site that should be cared for and preserved for future generations.

6. I object to the development of 40 houses at Send Hill. As mentioned above, this location is on a very narrow road and will be a disaster for the area in terms of traffic and spoiling the beautiful countryside. We use this countryside daily to walk our dogs and is one of the reasons we moved to this area. This area is in the Green Belt and is a precious commodity to local people and those from nearby urbanised areas that come to the area for a break from the stresses of urban life.

Please consider my concerns and objections above.
This email is to state my OBJECTIONS to the proposed changes to the Draft Local Plan which would affect our village of Send drastically.

I feel that despite a local swell of objections from people directly affected by the proposed changes, GBC have not listened to the people and insist on planning for our village to be ruined. I feel that our village has been targeted disproportionately for development by Guildford Borough Council. My future votes will reflect my feelings on this matter.

The village of Send is already congested with traffic. We live on Potters Lane and it is only a matter of time before speeding traffic coming off the A3 will cause an accident on our lane. Any further development to the area will worsen our situation here. Huge lorries have to drive up on to the pavement and risk hurting someone all the time. **This junction should be closed!**

I object to the Green Belt, Policy 2 at paragraph 4.3.15 - Send Business to be removed from the Green Belt because:

1. The increase in traffic along Tannery Lane would increase on this narrow lane and this road is already overused even with the existing development.

2. The existing buildings fit into the landscape and are now part of the countryside there (we walk there extensively with the dogs) but to increase the amount of space and the nature of its construction would be incongruous to the area and spoil the beautiful river landscape. We do not want further building here to ruin a slice of nature that is beneficial to everyone who lives nearby.

The above reflect some of my objections to the proposed changes to the plan. Please consider these and the views of other residents and please do not target our village unduly. We have a right to have our village preserved and it is only fair that development is spread over the area, not just to us.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>I object to the Policy A42 change at Clockbarn in Tannery Lane because:</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 A beautiful country lane, Tannery Lane, a haven amongst the huge roads nearby will become clogged with fast traffic speeding dangerously down country lanes and causing more gridlock with the A247.</td>
</tr>
<tr>
<td>2 The increase from 45 to 60 houses in unacceptable to us in the village as it will put pressure on already stretched infrastructure such as roads, schools, medical services etc.</td>
</tr>
<tr>
<td>3 This erosion of the Green Belt is a violation in my opinion. We need to preserve the green spaces for ourselves and future generations. When we decided to buy a house here it was not because the place was going to become a huge building site. We fear our house price will diminish as this become and undesirable place to live.</td>
</tr>
<tr>
<td>4 One to the attractions to moving to this area was the River Wey navigations and the beautiful countryside and views on our doorstep. This is being threatened by unnecessary development. Wildlife flourishes on the river and any encroachment on its territory is unacceptable.</td>
</tr>
</tbody>
</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/1685</th>
<th>Respondent: 15284577 / Helen Whiley</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>I object to the Policy A43 change at Garlick’s Arch because:</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 This is permanent Green Belt land and there are no “exceptional circumstances” to change this.</td>
</tr>
<tr>
<td>2 Huge objections from local residents have been ignored by you.</td>
</tr>
<tr>
<td>3 It is absolutely criminal to destroy ancient woodland that is rare and should be cherished not destroyed.</td>
</tr>
<tr>
<td>4 The joining up of Ripley and Send would create a polluted busy corridor and is against Green Belt principles.</td>
</tr>
<tr>
<td>5 It would increase traffic in our area to an unacceptable point.</td>
</tr>
<tr>
<td>6 There are too many houses proposed for this site for the area, roads and infrastructure to support.</td>
</tr>
</tbody>
</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
<table>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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<tr>
<td>Further development would cause even more strain on the local infrastructure of schools, Doctors Surgerys and indeed the Royal Surrey County Hospital. If continued development occurs, soon there will be NO differentiation between this area and London.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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<tr>
<td>I am writing to make my objection known to the so called Guildford Local Plan 2016 and the proposal to remove Green Belt Protection from the village of Chilworth which is in an area of Outstanding Natural Beauty. Further development of this village and indeed the surrounding villages of Shalford and Peasmarsh would completely desecrate the area, more cars, more heavy goods vehicles equals more polution, and the disequilibrium of natural wildlife habitat.</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>I strongly object to late inclusion of site A43 Garlicks Arch due to the following reasons:</th>
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<tbody>
<tr>
<td>There must be no development on designated Greenbelt land. It’s too important to the balance of the local community and the environment. Even a small area will make a big difference to wildlife. It’s what makes this area a pleasant place to live and visit. I object to any insetting of any villages from the Greenbelt.</td>
</tr>
<tr>
<td>The development will destroy the character of the surrounding area.</td>
</tr>
<tr>
<td>This development will cause more flooding due to the density or the proposed housing.</td>
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<tr>
<td>This development will add to existing local traffic congestion at peak times. There are constant backups and delays with current levels of traffic.</td>
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<tr>
<td>This development will cause more cramped conditions on commuter trains to London, lack of train station parking spaces etc.</td>
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<tr>
<td>The industrial site will add to the hot holes and the poor condition of all local roads.</td>
</tr>
<tr>
<td>This development will add to mean more local children will not get a place at their local school. There is no plan to meet secondary school requirements.</td>
</tr>
<tr>
<td>This development will put more pressure on the local medical centre in Send.</td>
</tr>
<tr>
<td>This development will not provide affordable housing due to their cost and the location is too far from Woking or Guildford where residents are likely to work</td>
</tr>
<tr>
<td>This development is poorly thought through and seems to be driven by an attitude of let’s build lots of homes, destroy the local area and make some money! Why not start with the brownfield sites first. How about focussing on the infrastructure first!</td>
</tr>
<tr>
<td>Please don’t destroy Ripley and Send.</td>
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</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: pslp172/1237  Respondent: 15284673 / Andrew Bell  Agent: |
| Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A43 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am writing to Object to the Policy A43 change at Garlick’s Arch because despite the changes:

It still recommends providing a large amount of new homes, which is always going to have an enormous impact on a local community.

It will still generate more traffic which will cause more congestion on local roads in and around Send and Ripley.

The air quality will get worse with the increase in vehicles.

It still means a greater pressure on, already overstretched, local public services.

It still does not feel like there is an exceptional circumstance to remove land from the Greenbelt.

It begs the question, what happened to all the thousands of previous objections?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2550  Respondent: 15284705 / Michael Case  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objection to the removal of the Green Belt Protection from Peasmarsh, Shalford and Chilworth

I wish to register my objection to your intention to remove 'Green Belt' protection from the villages within the Guildford Borough Council area.

It is well documented that the infrastructure of the area is under considerable strain and that unrestricted housing development of the area is not sustainable.

I therefore object to your 2016 Local Plan proposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1282  Respondent: 15284769 / Paul Barnwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3. I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5. I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6. I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
   6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

7. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8. I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
9. I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

10. I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/760  Respondent: 15284801 / Linda Jarvis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of evidence for the alleged housing need numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1285  Respondent: 15284801 / Linda Jarvis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to site A25 Gosden Hill Farm - massive overdevelopment of 2000 homes in the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/1286  **Respondent:** 15284801 / Linda Jarvis  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to site A35 Wisle Airfield - 2000 homes that are totally inappropriate and unsustainable development in the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/1283  **Respondent:** 15284801 / Linda Jarvis  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the late inclusion of site A43 Garlicks Arch

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/1284  **Respondent:** 15284801 / Linda Jarvis  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to site A45 The Talbot. This is over development in a conversation area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1287  Respondent: 15284801 / Linda Jarvis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to site A57 The Paddocks - 4 traveller pitches

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2552  Respondent: 15284801 / Linda Jarvis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to any "in setting" (removal) of any villages from the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2551  Respondent: 15284801 / Linda Jarvis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to the local plan as the development proposed is not sustainable(policyS1)</td>
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<td>I wish to register my objection to your intention to remove 'Green Belt' protection from the villages within the Guildford Borough Council area.</td>
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<tr>
<td>The infrastructure of the area is under considerable strain and unrestricted housing development of the area is not sustainable.</td>
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<td>I therefore object to your 2016 Local Plan proposal.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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Attached documents:

Comment ID: pslp172/4888  Respondent: 15284929 / Sally Vass  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/761  Respondent: 15284993 / Samantha Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brownfield site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1289  Respondent: 15284993 / Samantha Thompson  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the inclusion of the land for new on/off ramps at Burnt Common(A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.
The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>1. I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)</td>
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<tr>
<td>I object to the local plan based on the impact it will have on the special countryside of the borough.</td>
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<tr>
<td>The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy E1</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>1. I object to the sustainable employment policy (Policy E1)</td>
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</table>
| If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.
The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2561  Respondent: 15284993 / Samantha Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2562  Respondent: 15284993 / Samantha Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/2564  Respondent: 15284993 / Samantha Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy II)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2565  Respondent: 15284993 / Samantha Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. **I object to the lack of proper infrastructure planning for sites (Policy I1)**

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. There are no plans to improve these services. There is also no commitment to improve / expand the Villages Medical Centre or provide additional and acceptable school places. This should mean no development of the Garlick’s Arch site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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1. **I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)**

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2558  Respondent: 15284993 / Samantha Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to not protecting the Green Belt (Policy P2)

I object to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2559  Respondent: 15284993 / Samantha Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.
The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2556  Respondent: 15284993 / Samantha Thompson  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I object whole heartedly to the Guildford Borough Proposed Submission Local Plan (June 2016). I believe this Plan to be unsustainable, unworkable and, in many provisions, unnecessary.

Please find below my objections to specific policies and matters within the Plan.

1. I object to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over development, particularly for the villages between Guildford and the M25, including Ripley, Send and Clandon. The services in these villages will be unable to cope with the level of development proposed.

The strategic sites of Wisley Airfield (A35) and Garlick’s Arch (A43) are in unsustainable locations. They do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. There is a proposal in place to stop the bus that currently runs from Ripley to Guildford! Residents will have few options, but to be reliant on motor vehicles. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2557  Respondent: 15284993 / Samantha Thompson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the Borough Wide Strategy (Policy)

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/765  Respondent: 15285121 / Audrey Boughton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

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**Comment ID:** PSLPA16/766  **Respondent:** 15285121 / Audrey Boughton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

1. I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/1292  **Respondent:** 15285121 / Audrey Boughton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

1. I OBJECT to Gosden Hill development being in the Local Plan. The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.
No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The road through West Clandon is used as a regular route for HGV driver training and many times people have to mount the payment at the pinch points. I myself have burst a tyre having to do this to avoid a driver on the wrong side of the road.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
1. I OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)
Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPS16/1294 | Respondent: | 15285121 / Audrey Boughton | Agent: |
|-------------|---------------|-------------|-----------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

1. I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPP16/2578 | Respondent: | 15285121 / Audrey Boughton | Agent: |
|-------------|---------------|-------------|-----------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Policy D3 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

1. I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.
### Comment ID: PSLPP16/2575  Respondent: 15285121 / Audrey Boughton  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):**

5. I OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

### Comment ID: PSLPP16/2576  Respondent: 15285121 / Audrey Boughton  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):**

1. I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<td>1. I OBJECT to the loss of rural employment (Policy E5)</td>
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<tr>
<td>Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.</td>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<td>1. POLICY E6 - The leisure and visitor experience</td>
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<td>I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm. Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:</td>
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<tr>
<td>1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that</td>
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order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2582  Respondent: 15285121 / Audrey Boughton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2583  Respondent: 15285121 / Audrey Boughton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H3 – Rural Exception Homes

I OBJECT  This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2579  Respondent: 15285121 / Audrey Boughton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.
Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists pass through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

1. I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

11. I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse. The section of the A3 between Burnt Common and Burpham is recognised already as a black spot for road traffic accidents. This situation will be made much worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/2581</th>
<th>Respondent: 15285121 / Audrey Boughton</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/2573</th>
<th>Respondent: 15285121 / Audrey Boughton</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/2574 **Respondent:** 15285121 / Audrey Boughton **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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1. I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan.

1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I OBJECT to the Borough Wide Strategy (Policy S2)

a. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

b. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

c. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. In any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, with Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
A village like Chilworth MUST be kept within the Green Belt.

It is beyond belief that the Council could even consider ‘no protection against development’ in Chilworth and our other local villages – Shalford, Peasmarsh, Ripley, etc.

I strongly object to any such plans.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPA16/768</th>
<th>Respondent: 15285345 / Mike Boughton</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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1. I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPA16/769</th>
<th>Respondent: 15285345 / Mike Boughton</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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1. I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.
The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPS16/1295</th>
<th>Respondent: 15285345 / Mike Boughton</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A25</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

1. I OBJECT to Gosden Hill development being in the Local Plan. The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The road through West Clandon is used as a regular route for HGV driver training and many times people have to mount the payment at the pinch points.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is gridlocked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.
Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1296  Respondent: 15285345 / Mike Boughton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.
Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1297  Respondent: 15285345 / Mike Boughton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/2593  Respondent: 15285345 / Mike Boughton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2590  Respondent: 15285345 / Mike Boughton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2591  Respondent: 15285345 / Mike Boughton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
**Comment ID:** PSLPP16/2592   **Respondent:** 15285345 / Mike Boughton  **Agent:**  
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)  
Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.  
There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/2599   **Respondent:** 15285345 / Mike Boughton  **Agent:**  
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the loss of rural employment (Policy E5)  
Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2597  Respondent: 15285345 / Mike Boughton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.
Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other universities (e.g., Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g., by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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### Comment ID: PSLP16/2598  Respondent: 15285345 / Mike Boughton  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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1. **POLICY H3 – Rural Exception Homes**

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e., normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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### Comment ID: PSLP16/2594  Respondent: 15285345 / Mike Boughton  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists pass through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

1. I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/2595  Respondent: 15285345 / Mike Boughton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2596  Respondent: 15285345 / Mike Boughton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2588  Respondent: 15285345 / Mike Boughton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
1. I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2589  Respondent: 15285345 / Mike Boughton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

1. I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the
flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Objections to Guildford Borough Proposed Submission Local Plan (June 2016)**

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan.

1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Do you consider this section of the document: complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the Borough Wide Strategy (Policy S2)

a. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

b. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

c. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. In any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, with Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am particularly concerned with the over development proposed for the Horsleys, Send, Ripley and the proposals for the Wisley Airfeld.

Such overdevelopment will change the character of the area beyond all recognition. The proposed removal of the Horsleys from the Green belt would leave the area to the mercy of developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Respondent: 15287489 / John Bound</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The ensuing increase in traffic along wholly unsuitable narrow lanes will lead to a increased likelihood of accidents with the many cyclists enjoying this area.

Huge demand will be placed on local services which are already stretched.

It will turn this part of Surrey into another anonymous urban sprawl.

With greater creativity and thought, I am sure a balance can be achieved between the needs for housing and preserving the countryside for future generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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The green belt is essential to maintain an area where agriculture, forestry and outdoor leisure pursuits can flourish. This is exactly what has happened here and with the ever increasing outward pressure from London, it is even more important that the countryside is preserved for all to enjoy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/2600  **Respondent:** 15287489 / John Bound  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

I am writing to STRONGLY OBJECT to the proposed changes to Green Belt area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/2603  **Respondent:** 15287489 / John Bound  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Brownfield sites in the surrounding towns should be developed before open countryside is decimated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Re: Guildford Local Plan Dear Sir

I am writing to object to a number of points relating to the East Horsley, West Horsley and Ockham sections of the Guildford Local Plan.

Having originally replied to the earlier version of the Guildford Local Plan, as did many others, I had presumed that some fairly major changes would have been made to this version, in response to the criticism received. However I see little change in this version and indeed nothing that makes the plan more acceptable. It would appear to be another HS2 style project where the locals comments are considered of little importance! But here we go again.

The Horsleys and Ockham are small villages which have always been mainly Green Belt, a factor which to date has not prevented reasonable development, even though infrastructure failures continue to occur.

These three villages are seen as cash cow developments which always feature millionaire type properties that make the best profit for the developers but that do little for the young residents who have aspirations of living in the villages where they grew up. An element of so called affordable housing is usually included in the original plans but by the time the estates are built many of the affordable houses have been taken out of the equation by developer donations to other Council projects while those left which are often seen as too expensive for the affordable market and therefore after requests from the developers to the council they are often allowed to be sold to the normal market place.

The local roads between and connecting the three villages are all country lanes with access to the A3 extremely busy at certain times of the day, made worse by regular jams on the A3.

Road drains throughout the villages are constantly having to be cleared as the old pipework is regularly collapsing and/or being blocked by mud etc.

Public transport for the area is mainly by Main Line trains with two stations both located in East Horsley, these are Horsley and Effingham Junction stations which take huge numbers of residents off to London each day. Both stations have car parks but these are filled to capacity every day.

The East Horsley Doctors Surgery is stretched to breaking point with some people having to wait up to two weeks for an appointment.

The local schools are all sought after and feature both private and public, with the public schools well over subscribed.

The development of a further 2,500 plus homes in this area will only exacerbate the above problems and change the villages for the worse.

Removal of the Horsleys from the Green Belt and/or the extension of the boundaries of the settlement areas of the Horsleys is an obvious ruse to allow even further development of the area in future years without further need to come back to seek support from the residents.

I therefore totally object to your proposals:

- To remove the Horsleys from the Green Belt,
- To extending the boundaries of the Settlement areas around the Horsleys
- To the creation of 2,000 house village at Ockham
- To the creation of 533 houses across the Horsleys.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2612  Respondent: 15291905 / Jo Hutchinson  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The local infrastructure is woefully inadequate at the present time it would collapse under any the slightest increased pressure

Please take note of my views. I have been a resident in the Ripley area for all of my 50 years, and I have seen it systematically encroach and the infrastructure put under such a great strain

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2609  Respondent: 15291905 / Jo Hutchinson  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the erosion of the green belt
I object to any in setting of any villages from the green belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<td>I object to the over development of any one area in the borough</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object to the lack of evidence for the alleged housing needs</td>
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<th>Comment ID: SQLP16/640</th>
<th>Respondent: 15291905 / Jo Hutchinson</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?</td>
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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of provision of local schools hospitals & doctors surgeries and the lack of provision for new roads

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/772  Respondent: 15292065 / William Paul  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Shalford (south)

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to you to object to the latest proposal to move the green belt boundary and extend the village settlement boundary in Shalford. There are numerous reasons for my objection to this including:

- There is no valid reason to change the green belt boundaries which have been in place for a long time.

- Over 900 residents signed a petition objecting to the proposed settlement boundary change last year. If GBC supports the expressed views of the local residents to protect the fields from development, they should be retained within the current green belt boundary and be kept outside the village settlement boundary.

- The land contributes to the open character of the village and provides an attractive setting for the village’s community facilities

- The elevation of this land, which is 32 feet higher than King’s Road, is the highest in the local area. Any housing development built on it would tower over the village community facilities and the surrounding area, creating a real eyesore and damaging the local character.

- Most importantly, given the fact that access to the land is via Chinthurst Lane, the proposal it will create significant additional congestion on Chinthurst Lane, and significantly increase the level of safety concerns of residents on that lane. Chinthurst Lane is already heavily congested, bordered by significant levels of shrubbery and...
undergrowth, and with very limited pedestrian facilities beyond Poplar Road. The corner here is already blind because of overgrown shrubbery - any increase in traffic volumes on Chinthurst Lane will inevitably lead to an accident at that point. I live in a house with a dog and two small children and already feel that Chinthurst Lane is dangerous because of the volume of traffic, the speed at which it comes along the lane, the narrowness of the lane, and the limited pedestrian facilities. Building any further housing at the proposed location would significantly compromise the safety of local residents and children, putting them at risk of traffic incidents and significantly increase the likelihood of accidents on that road.

I trust that you will act with your best judgement and conclude that the proposed changes do not make sense and indeed could potentially be dangerous.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1064  Respondent: 15292129 / Shirley Wilson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object that lack of local of immediate provisions for new schools has not been thought about before putting the proposed plan have been put forward.

I object that the lack of any immediate provision for doctor surgeries and how the NHS hospital health services would cope with the increase of people needing to use these facilities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/777  Respondent: 15292129 / Shirley Wilson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the lack of any evidence for the alleged housing need numbers. I think there should more research into what housing and where the housing should be built. The infrastructure and amenities can thought about before any planning to put forward.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Site A25 Godsen Hill Farm as it’s a massive overdevelopment of 2000 homes on green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the site A35 the land at the former Wisley Airfield as the roads are all ready congestion it would only get worse and the 2000 homes are totally inappropriate and unsustainable development in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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<tr>
<td>I object to the land A43 at Garlick’s Arch, Send Marsh/Burnt Common and Ripley to the 400 homes and the industrial development on Green Belt land. The infrastructure and amenities would not be able to cope with traffic the noise and the schools with more people in the community.</td>
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<tr>
<td>I object to A45 the land at the rear of the Talbot, High street, Ripley this would expand the boundaries of the village and the main road car parks could not cope with any more traffic it’s bad enough at the moment in rush and you cannot park to pop to the post office or to use the local amenities.</td>
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<td>I object to the site A57 the Paddocks as this unlawful and would change the local community. The village cannot cope with anymore cars, traffic on the local roads.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to these plans to as the roads cannot cope with more traffic there often queues of traffic in rush hour and this will only get worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/2644</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to any “in-setting” of any villages from the Green Belt as these spaces should be looked after not built on for future generations can enjoy the local green belt and having to leave extra early to do short journeys like to work, school or for leisure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3644  Respondent: 15292129 / Shirley Wilson  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I writing to object to the 2016 draft local plan to the Send, Wisely, Ripley.

I object to the erosion of the Green Belt around these locations it will spoil the whole feel of the villages and why we choice to live in Send Marsh. Once the green has gone it can’t be brought back.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3648  Respondent: 15292129 / Shirley Wilson  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/3647  Respondent: 15292129 / Shirley Wilson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the disproportionate amount of development in one area of the Borough. There must be other areas that can be development to share the impact it will have on local area and do we really need all these developments. I believe we don’t and object to the amount of developments plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/705  Respondent: 15292129 / Shirley Wilson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

object to the lack of any evidence for the alleged housing need numbers. I think there should more research into what housing and where the housing should be built. The infrastructure and amenities can thought about before any planning to put forward.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/641  Respondent: 15292129 / Shirley Wilson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the last minute inclusion of new sites with less than 2 weeks’ notice and seems to be rushed and the effect it will have on the lives of the residences and amenities.

I object that they seemed not to be thought about before putting the plans forward.

I object to the limited consultation period we should more time and time to have information given to us to how this will affect the local schools, roads, traffic and amenities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/778  Respondent: 15292193 / John and Fiona Gilbert  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Forsaking Green Belt & The Local Plan

Before getting to the nub of this e-mail, let me first explain why my wife and I are perhaps in a more tangible position than most others who are in equal measure literally up-in-arms of the above twin proposals.

In short, we have just recently returned to live in Ripley after only two years away and what we have immediately noticed is the substantial increase in traffic. This factor is not only due to a number of brown-fill sites that have been cleverly utilised as much needed dwellings but also due to the seemingly insatiable effects of living nearby to our capital. The term supply and demand fits the bill perfectly.

Thankfully, at the moment Ripley, Send and their neighbouring communities are just about able to cope. Of course at peak periods traffic becomes tiresome but that is a problem for the South-East in general and is not unique. Having made this point however, should no further invitation be made to developers, within the next five to ten years or so we shall nevertheless experience deadlock. A five-year plan to negate this forthcoming problem should be on your agenda now and not the unwise invitation to build upon the green belt that the twin proposals offer.

To close this issue, most reasonable, free-thinking councillors who are not manacled by political dogma will agree. And, please do not simply place these comments in the filing cabinet marked ‘not in my back yard,’ for to do so would be a gross distortion of the truth and unworthy!

We will now bullet-point our objections.

1. We object to Send Village being removed from the green belt. It would amount to both folly and chaos.
2. We object to any further development at Clockbarn Nursery. The roads are simply unsuitable and traffic danger would follow.
3. We object to the unreasonable proposals to over develop Garlick’s Arch. In part, the area acts as a flood plain. What folly it would be to hinder this essential environmental aid.
4. We object to any development to Send Hill. Forty new dwellings and two travellers’ pitches would again cause traffic chaos and spoil this idyllic and peaceful area. Do remember that some of the area is land-fill and that many years ago our forefathers chose in-part to home a church and a cemetery. Let those that are buried there rest in peace.
5. We object to the proposal to use the opening of the A3 interchange as a hostage. We are aware that this is a bargaining tool for the over development of the old Wisley airfield and the idea is in our layman’s view rather underhand.

Finally, please do not harbour and rancour or malice as we are well aware of the pressure you are all having from our political masters, especially in this so-called period of austerity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
SCHOOLS - there appears to be no provision within the Council proposals for any immediate provision for any new schools or extension to existing schools, most of which are already under extreme pressure through oversized classes and lack of funding.

HEALTH SERVICES - there appears to be no provision in the Council proposals for any immediate provision for any new medical facilities such as Doctors Surgeries or extensions to existing facilities.

TRANSPORT - the introduction of a proposed 14,000 homes in the Borough will put an unacceptable and unsustainable pressure on public services that are already failing the public due to cut backs and lack of investment. Many residents will prefer to use their own vehicles to go even short distances and suffer the inevitable traffic jams, rather than use a public transport system that simply does not encourage its use.

I trust that the above points are clear and that my objection will be recorded along with the many thousands of others the Council will undoubtedly receive as a result of their unworkable and highly unpopular development plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

GREEN BELT EROSION - Ripley, Wisley, Clandon and Send should not be removed from the Green Send provides a buffer between Woking and Guildford. The Green Belt was originally formed to avoid amalgamation of villages into towns and towns into cities, by unregulated development or Urban Sprawl. Much has been made in recent years of the plight of certain species of birds and reptiles and destruction of their habitats by development - and yet the Council are exacerbating this process in their wanton desire to take the easy and cheapest option and develop in the Green Belt - home to a myriad of Flora and Fauna. The Green Belt should be left alone and more use made of existing developed (brown field) land - a prime example being Wisley Airfield.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
**Comment ID:** PSLPP16/2652  **Respondent:** 15293793 / Anita Norman  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**DISPROPORTIONATE DEVELOPMENT** - The Council are proposing thousands of houses in Send, Ripley and Wisley, areas that already suffer horrendous traffic issues as main feeder routes to the A3 and M25. The whole road network is under extreme pressure during rush hours and in the event of traffic accidents or roadworks gridlock is often the result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp172/1331  **Respondent:** 15293793 / Anita Norman  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**POLICY A42 – CLOCKBARN NURSERY, TANNERY LANE**

The increase in the number of residential units from 45 to 60 (+15) is over a 30% uplift on a relatively small site and will lead to a cramped overdevelopment and an unacceptable increase in hardstanding to accommodate the increased parking and access roads resulting in further erosion of the Green Belt.

Tannery Lane is a narrow secondary road that in parts is almost a single track width and therefore traffic problems will be more frequent commencing with the construction of the development requiring large vehicles and plant to manoeuvre into and out of Tannery Lane.

The junction of Tannery Lane with Send Road is very restricted and requires substantial improvement to accommodate the increased use and to provide adequate safety for both pedestrians and vehicles.
The proposal would severely impact on the open aspect of the surrounding Green Belt and in particular the views from the River Wey Navigation.

The increase in units now proposed by the Council completely ignores the hundreds of previous objections made by local people.

Recent flooding issues in and around the immediate area highlight the need for a conscience approach to development and by increasing the number of residential units on this site the incidence of flooding will be increased.

The recent approval of the planning application (14/P/02289) for the Cartridge Traditional Narrowboat Basin on the River Wey Navigation, (construction works are now underway) already puts pressure on the Tannery Lane junctions with Polseden Lane and Send Road. Therefore the cumulative effect of both developments will result in an increase in the potential for accidents at the road junctions unless substantial highway improvements are made. Also there are over 50 parking spaces within the Cartridge Basin application site which, together with the associated hardstanding, severely impact on the rural nature of the surrounding Green Belt area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY A43 – LAND AT GARLICKS ARCH, SEND MARSH

The proposal for 400 residential units and 6 travelling showpeople's plots on a Green Belt site is contrary to current policies and ignores the many thousands of objections previously made by local people.

No ‘Special Circumstances’ exist or have been put forward to justify development on this Green Belt site.

The development will put extreme pressure on local roads and when considered with the other nearby proposals for development currently being put forward by the Council in the Draft Local Plan, (both residential and commercial/industrial), will result in gridlock at peak times with the resultant detriment to the quality of life and environment in the area, particularly considering the impact that the proposed North and South slip roads on to the A3 would make by drawing more traffic on to the local road network.

Residential development alongside major highways is known to cause health problems in the very young and old and if this site is developed the long term impact on the residents will in turn put more pressure on local and County Health facilities, particularly if the A3 slip roads abutting one side of the site, (as previously mentioned) are constructed thus increasing traffic flow around the site. The A3 is a major Trunk road that will inevitably become overloaded in the not too distant future given the lack of infrastructure improvements proposed by the Council to cope with the influx of traffic with regard to both proposed imminent and long term development.

The site contains ancient woodlands and should be protected (and enhanced) against development that might impinge upon the quality of the surrounding area and adversely affect the survival of the trees which are regarded as an important amenity for the area and can be seen from distant views.
Garlicks Arch adds to the important Green Barrier that separates the villages of Ripley and Send Marsh and any erosion of this will set precedent and eventually result in the merging of the two villages contrary to National Green Belt policy.

The site is currently designated as within Flood Zone 2/3 and as such development within Flood Plains should be avoided. If development is inevitable then Surface Water mitigation/management must ensure that flood water is properly dealt with and NOT directed so as to cause flooding elsewhere on existing developed land.

There is no proven demand to accommodate Travelling Showpeople in this area who, by the very nature of their business, will bring more traffic problems for the Ripley and Send villages when transporting very large vehicles to and from the site, where the visual impact of the vehicles and structures when stored, will be detrimental to the surrounding area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1327  Respondent: 15293793 / Anita Norman  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY A58 – LAND AROUND BURNT COMMON WAREHOUSE LONDON ROAD SEND

The proposal for commercial/industrial development on this site is contrary to Green Belt policy.

There are a number of suitable vacant sites and buildings in Slyfield and Guildford and there is no proven need to develop this essentially farmland site.

The previous development proposal for this site in the 2014 Draft Local Plan was eventually deleted from that plan due to the objections raised. In the 2016 Draft Local Plan the proposal was re-introduced for a MAXIMUM development of 7000m², however in the current 2017 Draft Local Plan the proposal is for a MINIMUM of 7,000m² which could lead to a vast overdevelopment of the site with resulting negative impact on the quality of the surrounding area and the inevitable increase in traffic problems, particularly when considered with the many local developments currently being put forward in the 2017 Draft Local Plan and as stated above.

The proposed development would be detrimental to the existing residential properties along this section of the London Road by way of increased noise, traffic, environmental and visual impact, including the potential for parked lorries and trailers when arriving at the site ‘out of hours’.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/313  Respondent: 15293793 / Anita Norman  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY P2 – GREEN BELT – SEND BUSINESS PARK OMISSION

- It is noted in paragraph 4.3.15 that it is intended to inset (exclude) a number of developed sites from the Green Belt, Send Business Park in Tannery Lane being one of them even though there are no ‘Special Circumstances’ put forward to justify this.
- The site is a non-conforming use within the Green Belt however this alone does not justify its exclusion from the Green Belt, in fact there are a myriad of such sites throughout the entire National Green Belt.
- The site is NOT a major developed site within the Green Belt and therefore does not warrant exclusion. The group of existing buildings is not excessive and is surrounded by open fields and the River Wey Navigation therefore the site has an open character (an essential characteristic referred to in Policy P2 paragraph 4.3.12 and 14) and makes an important contribution to the Green Belt.
- If exclusion of this site from the Green Belt designation is intended to promote further development, residential or commercial, then this will only serve to increase the problems of traffic congestion and highway safety along Tannery Lane and its junctions with Polseden Lane and Send Road particularly at peak flow times.

I trust that the above objections are self-explanatory and I would be grateful if the Council and the Planning Inspectorate would carefully consider the points raised in relation to the proposed alterations made to the 2017 Draft Local Plan and in securing a positive future for Guildford Borough and its residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/788  Respondent: 15294113 / M J Hickman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of provision for schooling, health provision, water/drainage requirements. Large developments cause difficulties in disposal of surplus water which cannot drain through concrete.

The scheme is unnecessarily large and will cause a huge, irreversible loss of Green belt and open space, and cause many infrastructure problems, particularly traffic and access.

I hope that our fears and concerns will be completely and thoroughly considered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<td>I object to the lack of proof that all the numbers of houses, sites etc quoted are in fact correct.</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to the plan for the Garlick’s Arch, for there is not the need for the number of houses proposed, nor the industrial site. It will also mean the closure of the Clay Pigeon Shooting club on land by Kiln Lane, as well as impinging on the attraction of the surrounding area. The club has been there since 1980 and will be unable to relocate, thus removing a facility enjoyed by upward off 100 members and guests.</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
I object to the late, unconsulted, plans for Winds Ridge and Send Hill.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2661  Respondent: 15294113 / M J Hickman  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposals for new roads which will exacerbate the existing traffic problems such as the access to Wisley Gardens, and the local villages

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2654  Respondent: 15294113 / M J Hickman  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the plan to remove the protection of Green Belt status from the area proposed in the Plan. Green Belt should be retained, not destroyed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2663  Respondent: 15294113 / M J Hickman  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
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I object to this plan putting an overly large strain on one area of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to the late alterations to the numbers of houses required which require further consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I am writing to show my objection and dismay at the proposed abolition of Green Belt Land around the villages of Chilworth, Shalford, Peasmarsh and surrounding villages. Green Belt land should be reserved for exactly what it says GREEN BELT, the villages are in an area of Outstanding Natural Beauty within the Surrey Hills.

Pollution through extra traffic through the villages and the destruction of wildlife habitat will have a completely detrimental affect on the 'country side'
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3411  Respondent: 15294817 / Rosie Thomas  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing in order to register my objection to the above proposal, and emphasise the unacceptable impact it would have on our community.

While I do accept the need for additional housing on a modest scale; definitely not the huge number proposed. This would double the size and completely change the character of our village – without including necessary amenities.

I see no plan for the provision of medical surgeries, shops, pubs, or facilities for young people. Indeed local services would not cope with the magnitude of the proposed expansion; my cottage is already subject to electricity cuts.

I challenge the view to build a new Secondary School: The need is not proven - our current schools are under subscribed. The Head teachers of both Ash moor and Kings say no new school is necessary. Indeed they would co – operate in building extensions if, as and when necessary.

An enormous transport issue would result. Westwood and Glaziers are rural lanes including Grade 2 listed houses and would be unable to cope with the influx of 12/1500 pupils and 1100 houses! The railway bridge would also be an issue re height and route visibility. Existing road links A323 Guildford Road is currently saturated. School Lane with Wyke Primary School is already a dangerous spot.

Glaziers Lane already has sewage issues in respect to flooding:

Our environment is under the protection of the Thames Heath Basin considering the ecology of wildlife and prevention of light pollution.

I sincerely hope that Normandy’s voice is heard. The above proposal is clearly against the wishes and best interests of our existing community.

I trust it will not be taken forward.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/794  Respondent: 15294881 / Jean Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley South
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object strongly to the building on green belt if started where would it stop.

I object strongly to the new interchange at burnt common the by pass was built to do exactly that, bypass the villages. The road cannot be widened to take traffic plus Clandon road two large vehicles cannot pass in certain parts of this road plus send rd could not take extra traffic.

I object strongly to building houses on the greenbelt land and a industrial space at Garlick's Arch, I have lived here 50 years and know that land can flood also cannot build under Pylons where would all this extra traffic go as often it comes to a standstill now roads are in an appauling state also this field grows corn etc.

I object to houses = 2 travellers pitches send hill as once again very small narrow roads for traffic who will be responsible for rubbish and spoilt countryside from travellers pitches which always happens, I have seen this before.

I would like to ask as it is at the moment my grandson could not get into any of the 4 schools requested so now he will have to be driven to school and also his sister where they have a school within walking distance which my grand daughter does now she is 7 he is 4. So where are all these other children going to school. Perhaps this is why obesity is here?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent:</th>
<th>15295105 / Sally De-Merist</th>
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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A46</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the proposals regarding the building of 1100 new homes and a school, in our very rural village of Normandy, as documented in the local plan.

Some of the reasons for my objection are:

I do not believe there to be a genuine need for a new secondary school in this area. Several of the existing schools are under subscribed, and some by a large number. In total the number of places available at these existing schools exceeds those that would be provided by a new school.

The land in question is green belt. This would seem to be yet another way to bend the rules and allow planning as an 'exception'. The exception being created by the need for the school. Surely for this to be the case a new school should be needed to educate the existing population of the area. The idea here seems to be that building 1100 new home may give rise to the need for a new school, which surely means that allowing a developer permission to build houses, thus creating this need, is somewhat loosely applying the exceptions rules.
Some years ago Normandy Parish Council, in association with GBC, commissioned a housing needs survey to establish whether there was a need for affordable housing in Normandy. Having analysed this report it was clearly flawed and did not actually represent the needs of our community. The reliance of this report allowed developers planning permission, on green belt land, under the rural exception policy. I understand that analysis of the SHMA that GBC are relying on to demonstrate the need for 1100 house in Normandy has led to very similar findings. Once again it seems clear that this whole proposal is being led by a developer.

The land in question was not identified as a potential development site in the previous local plan. Inclusion in the current plan seems to be wholly developer led. I suspect that councils up and down the country are considering proposals for new schools from developers as it is the latest loophole to be exploited.

Finally I object because we are not talking about a few houses along the road. If you allow this development it will be to destroy all that we love about Normandy. I accept that it would be more convenient to have a shop, or a pub, or even a post office. However, if these things are only possible by creating a town where we once had a lovely village, then I prefer to continue to do without.

Please do not allow this development on our green belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/796  **Respondent:** 15295137 / Helen Trott  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Ripley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):**

My name is Helen Trott, former Senior Management to E.ON UK PLC specialising in Carbon Emissions working with Local Authorities, Registered Providers and Community Networks;

Last week I had the pleasure of seeing some wonderful areas of Guildford in particular Ripley, while I was a passenger on business I didn’t know Guildford had green, hills, and lots of cyclists and some amazing old historical buildings ……., while I was a passenger on business,

I do not live in the area so I require this entire information to be deemed “Independent”, I also do not know any members of the Council or the Community, Therefore this information is completely of the intent to ensure that the information I have digested from both standing cases of pro and cons to be re-evaluated as there is “gaps”

The gaps are a duty of the CEO of Guildford Borough Council “Community Obligations” & his or hers “Executives” as per the clearly cited information surrounding the Health Act 2007 and questions to the party and executive responsible as per special meetings headed on the 8 April 2010 “in ensuring “all” processes are complied with especially around the laws within the Environmental Act 1990”

This bringing a question that over arches any movements on the planning “ A change of lead to area responsibility “

To ensure a fair process has be complied with a request for special resolutions under the companies act 2006 must be considered “after the following evidence has been brought to committee to re-evaluate strategy “
1. Evidence the soil governance has been complied with with pre testing of toxins already held within the soils, noting there is plans for the Industrial and Homes, it needs to “prove” there will be no wider impact on the soils variations and the key point that an area so large effects the light energy that the land needs to create oxygenation which in laymen terms means “our air quality”

2. Evidence that the homes are “not” going to contribute further to Carbon Emissions [CO2] impact and how this will be presented for validations based on all sources of manufacturing production and installation involved and their own standing Carbon reduction Policies and process “by law” and inline with relevant ISO carried with the processes to ensure any impacts are minimal - I doubt this can be evidenced back to back to the council

3. The Increase of transport Carbon Emissions on top of an area that already has a massive “unknown” air quality issue from the M25 and interconnecting city functions of commuter traffic which in some cases makes tourism of the natural beauty to be at risk in the future in particular how the next generation in the area will cope with the heavy emissions impacts

4. How is the Carbon emissions going to be controlled from the Property Owners and UK corporate Governance of which holds heavy policy in which they must adhere to before just building a site to profit

5. What thermally efficient materials are being proposed on the site[s] and what measures will be technically adopted to Prove A a pre and post “should the site be granted on all evidence of the above being provided and legal “

6. Where was the process to the community being involved in the Councils Planning which by law states a committee approval process

7. who are the industrial buildings being built for and “said contractor emissions “ and what value is the interest to the companies profits, and what percentage is being proposed to give back to the community on top of evidence to points 1-6 should the site go ahead to enable planting “triple” to the damages of what will most certainly create an additional risk of carbon footprint/damage to greenery that produces oxygen content and photosynthesis to “clean air of breathable damaging toxins” and scientifically proven in the “East of England with the Borough or Kings Lynn and West Norfolk “Nelson Country” -

Environmental Acts in-line with added value and compliance to Air, Light, Soil, and Noise governance and extract Pollution(s) risks overarched by the impact of Carbon emissions that require good practice and sustainability to comply with all elements of this Sustainability Policy

Environmental Act 90 there is call for the 'live control of carbon emissions through intellectual ongoing processes, which includes all means of controls applied to land and air movements from defined subject matter assets - an asset of which has an emission impact and effects cause for concern to future generation.

(i) Environmental Act Section 2 prescribed processes (5)(6) a, b, pointed to 'regulations may designate the substance as one for central control or one for local control' (7) of the environmental act 1990.

(ii) F36 the Clean Air Act 1993

(iii) F36 Section 3 of the Clean Air Act 1993

(iv) F25(C) Subsection 12 “private dwellings’ means any building any part intended as a dwelling

(v) (1) (c) fumes or “gases” emitted

The Natural Environment Research Council shall be a body established wholly or mainly for objects consisting of or comprised in the following, namely, the carrying out of research in the earth sciences and ecology, the facilitating, encouragement and support of such research 'by other bodies or persons or any description of bodies or persons and of instruction in subjects related to the Council’s activities' 'the dissemination of knowledge' in the earth sciences and ecology, the provision of advice on carbon emissions impacts across 'all standing policies'.

1. is solar being used as a material is of has the products been tested on the “Artificial Light Pollution” variance to the area and more so the “flight paths” of the already existing emissions impacts of the Heathrow and Gatwick airport which penetrates soils - if the material is PV based then this is not a sustaining measure as it blocks natural light energy to the soils and oxygenation to the communities “Air Quality”
Should the validation of my content need to be validated please contact Councillor [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] on the work in their Borough re the Science and technology act 1986 and how in the 21st century technology needs to be heavily validated a firms say so to it adhering to policy and the point of a clean energy future both natural and sustaining - [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998]. and I attended Westminster back in 2014 where by I predicted a current standing problem in the Energy Company Obligations, its Carbon emissions and data breaching issues; of which is now being led by their largest RP due to the impacts on Welfare and “People”

I hope the information helps “both parties “ make the right and ethical decision to this very historical area

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>We would also ask for further evidence to prove the need for such a high numbers of new homes with predictions doubled in the proposed plan from previous.</td>
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<td>We object to the 2016 draft local plan. Living in Burpham gives us great access to the local green belt that we feel will be lost for ever if the proposals for the 6000 homes go ahead in the areas close to us. In particular the closest Gosden Hill's allowance of upto 2000 homes will take the defined edge of Guildford's urban boundary out across the green belt and essentially join the villages of Clandon, Send, horsey and Ripley together over time. This loss of open space around Guildford will cause Guildford to loose its identity and space for many to enjoy on foot, bike, horse etc. There appears to be a disproportionate level of development identified for this side of the city</td>
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Our second objection is regarding the local infrastructure. We are far from convinced that the proposed road improvements to cope with the planned developments are adequate. The addition of some 6000 homes to this area of the borough will inevitably add massively to the number of cars using both the A3 trunk road and the local roads in Burpham and into the town centre. Driving to work as we do we have noticed over the last 10 years a huge increase in traffic and the A3 simply cannot cope any longer with queues regularly reaching back to before the Burpham exit and the London road toward Guildford constantly moves at a snail's pace. Even weekend traffic is now becoming noticeably heavier and a slight incident such as an accident or heavy rain brings the whole road network to a standstill extremely quickly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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As it is at present, the traffic during the 'rush hours' is almost continuous with long tailbacks at every junction, the parking in the village is becoming beyond a joke and to get a local doctor's appointment when you need one is just a matter of luck!!

I would therefore like to register my strong objection to removal of the Green Belt status of this and surrounding villages.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<th>Respondent: 15295425 / Gordon Harris</th>
<th>Agent:</th>
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<td><strong>Document:</strong></td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong></td>
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</table>

The Metropolitan Green Belt was set up in 1935 to control urban growth around London. In 1947 this was extended to local authorities in the Town and Country Planning Act. In 1955 the Minister of Housing encouraged local authorities around the country to do the same. Chilworth thankfully is included in this Green Belt, if this were to be removed unscrupulous developers with no other interest other than to make a 'fast buck' and move on would be given access to the land around our villages to cover them in thousands of houses as this would be considered 'approved in principal' outside the Green Belt. No thought as to how our local doctors, schools and road infrastructure should cope has been given, the roads in particular around my village of Chilworth are in a deplorable state requiring total rebuilding in some places not just a splash of Tarmac and a heavy boot to settle it down as seems to be the usual system!

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<tr>
<th>Comment ID: PSLPP16/2676</th>
<th>Respondent: 15295713 / Maureen Osmon</th>
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<td>( ), is Sound? ( ), is Legally Compliant? ( )</td>
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</table>
I write to register my objection to the Guildford local plan 2016.

Now more than ever before the green belt is essential to us all. To remove the protection it provides in safeguarding the "lungs" of the country would mean its demise for evermore.

People of all walks of life, all ages, all interests flock to enjoy the advantageous effects it provides. In so doing many small and cottage industries thrive. People use the green belt to walk, cycle, fish. It makes money for transport companies too, and provides opportunities for local schools to provide extra curricular activities cheaply and conveniently.

Obviously I want the green belt to continue to be protected for us all, town and country folk alike but in addition I want any councillors involve to look deep into themselves: please do not remove this protection of the green belt because it's the easiest thing to do; because you can't be bothered to use your heads to think of the alternatives, and most ESPECIALLY because it will fill the council coffers with easy money.

THERE ARE ALTERNATIVES

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the proposed Infrastructure Schedule.

Plan does not take into account Garlick's Arch (A43) from an infrastructure perspective (nothing in Appendix C). It is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Strategic Housing Market Assessment figure of 693 houses pa being too high.

The Council will not publish the SHMA report, so the figure cannot be verified. This lack of transparency is not right for consultation on the Plan. The number is not credible as it is more than double the figure of 322 used in previous plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1318   Respondent: 15295809 / David Lees   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of Garlick's Arch (A43)

Garlick's Arch is Green Belt and there are no exceptional circumstances which allow for it's removal from the Green Belt (Policy P2) - housing need is NOT an exceptional circumstance.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1319   Respondent: 15295809 / David Lees   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
GBC have removed a brownfield site at Burnt Common replaced it with Garlick's Arch, despite the preference for previously developed land in the Plan.

The site is not appropriate because:

- It floods regularly
- There is no adequate public transport, and no plans to improve local roads
- GBC do not propose to improve local schools, medical or utilities to cope
- It has ancient woodland and is home to many wildlife There is no wildlife report for the site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I object to the proposed on/off ramps at Burnt Common (A43a)

The local communities do not need North facing ramps to the A3 at Burnt Common; these would draw in a huge amount of 'through' traffic, for example all traffic from London/M25 to Woking would go through Burnt Common. The villages do not need this and this is not sustainable as the roads cannot be improved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I object to the the scale of the proposed development.

The Garlick's Arch (A43) proposal would double the built area in the locality, and would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Plan's approach to leisure and visitor experience.

Guildford has many "leisure and visitor attractions" already. The case for creating more is not made in the Plan and no examples are given. The borough's prime leisure and tourism asset, its countryside, needs to be protected from inappropriate development. The presumption in favour of development would lead to overdevelopment, and heritage sites and the Green Belt are particularly vulnerable to harm.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object due to the increased traffic and congestion that development will cause to the village roads.

In Ripley, Send and Glandon, there is already far too much traffic. The proposals will cause more traffic and congestion. 5000 more houses in this area of narrow rural roads, which are not planned to be improved is dangerous as many are bad condition and have no facilities for pedestrians or cyclists.

The rural roads in this area are narrow, in poor condition and have no footpaths. 5000 more houses means dangerous and unsustainable traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/2692  Respondent: 15295809 / David Lees  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inadequate infrastructure planning for sites.

The huge scale of development proposed is not supported by adequate infrastructure improvements, especially at Garlick's Arch (A43) which has no infrastructure proposals at all.

The local Plan does not provide for improvements of the medical and police/emergency services to cover the 5000+ houses in the north east of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2686  Respondent: 15295809 / David Lees  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the increased congestion on the trunk roads, A3/M25.

The M25 and A3 are overloaded. Highways England has no plans to consider improvements on the A3. No improvements are planned to A3 or M25 before any development is done and this is contrary to the stated aim of the plan so the developments at Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25), should not take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2690  Respondent: 15295809 / David Lees  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to worsening air quality.

It is not appropriate to inflict upon local residents the greater levels of air pollution that the developments proposed and the associated further traffic congestion will cause.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2678  Respondent: 15295809 / David Lees  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the Green Belt not being protected.

I object to removing Ripley and Send from the Green Belt. With Wisley Airfield (A35) and Garlick's Arch (A43) and the villages will be be close to merging resulting urban sprawl, which is specifically what the Green Belt is designed to prevent. National Planning Policy requires exceptional circumstances for these villages and sites being removed, and there are none.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2685  Respondent: 15295809 / David Lees  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to building in flood areas.

The Plan does not take adequate account of flood risk. The Environment Agency have assessed Garlick's Arch (A43) is as being in a higher risk of flooding than the Council's own assessment. As a local resident I know this area floods regularly and in fact even flooded this SUMMER! The council's assessment is not good enough to be included in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<tr>
<th>Comment ID: PSLPP16/2679</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to the Local Plan as unsustainable. The number of news houses of at least 13,860 new houses is not sustainable. The over-development will irrevocably damage local communities, especially Ripley, Send and Glandon. The local communities don't need these houses. Everyone will need to drive a car as Wisley Airfield (A35) and Garlick's Arch (A43) have no railway stations and inadequate bus services. The Plan has nothing to improve the infrastructure for Garlick's Arch. What changes (2016)/further amendments (2017) do you suggest should be made to the document? Attached documents:</td>
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<td>Comment ID: PSLPP16/2687</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to the lack of any constraints being applied to the housing policy. GBC's proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey. What changes (2016)/further amendments (2017) do you suggest should be made to the document? Attached documents:</td>
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<td>Comment ID: PSLPP16/2688</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
I object to imbalance of development in the Borough.

There is too much development in the north east of the borough (Wisley [A35], Ripley/Send (A43) and Glandon [A25]). 36% of all the Plan's new housing is proposed in this area, which has only 11% of the existing housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2714  Respondent: 15295809 / David Lees  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( Yes )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the loss of local community identity

A 5 mile stretch between M25 and Burpham is proposed to get more that 5000 more houses which will lead to the urbanisation of the villages into one mass.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/800  Respondent: 15296065 / Leslie and Marie Field  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Chilworth

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Please keep Chilworth in the Green.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2691  Respondent: 15296097 / Sally Hills  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I learn with deep regret that the new "Local Plan" proposes removing the outlying villages south of Guildford from green belt status. As a resident for 39 years of Chilworth I object most strongly to this. The idea of turning these beautiful Surrey villages into housing estates - for what benefit - is preposterous and sheer vandalism.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1323  Respondent: 15296289 / Angela Pope  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Garlick’s Arch (A43)
Garlick’s Arch is protected Green Belt land. There are no excuses for removing it from the Green Belt.

The land has no transport infrastructure, it’s liable to flooding and the woodlands (including more than 80 ancient oaks) and the wildlife they support should be preserved for future generations.

Air quality (Policy I3)
I have huge concerns about the air quality/ increased air pollution, which will have an impact on the health of residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1322  Respondent: 15296289 / Angela Pope  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
As someone who attends regular meetings in Send and is a frequent user of the A3M25, I object to these proposals because of the congestion it will cause in Ripley, Send and Clandon and the additional traffic on the already busy A3/M25.

**On/off ramps at Burnt Common (A43a)**

Traffic to Woking could use Burnt Common, Send and Old Woking as a cut through causing unprecedented traffic levels and air pollution in the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2695  Respondent: 15296289 / Angela Pope  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The so-called policy of in-setting the villages of Ripley, Send and Clandon is just a euphemism for ignoring their Green Belt status to suit the Borough’s convenience.

These villages are and must remain Green Belt areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2694  Respondent: 15296289 / Angela Pope  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to this because of the deleterious effect it will have on tranquillity and charm of the villages of Ripley, Send and West Clandon. The sheer volume of houses proposed will place an enormous strain on the services and infrastructure of the surrounding villages. Such a development should be in an urban area where there are existing transport networks.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Comment ID: PSLPP16/2696</th>
<th>Respondent: 15296321 / Christina Rowley</th>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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</table>

I support the GRA response and Oppose Guildford expanding by a quarter.

Expansion should be constrained to protect the character of town and country in our very congested gap town.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>Comment ID: PSLPP16/2709</th>
<th>Respondent: 15296513 / Edward Osman</th>
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I write to register my objection to the Guildford local plan 2016.

Now more than ever before the green belt is essential to us all. To remove the protection it provides in safeguarding the "lungs" of the country would mean its demise for evermore. People of all walks of life, all ages, all interests flock to enjoy the advantageous effects it provides.

I understand that you have financial issues, however this is entirely of your making due to your short vision proposals. Inefficient spending is plain to see, for example the cheap and poor quality of resurfacing roads, that requires more maintenance and money in the long run. Another example, resurfacing a road and then soon after ripping it up to access the plumbing. Another example, increasing council taxes to a level so high that local businesses cannot survive.

If housing was built in these areas, how do you suggest you will gain access to further capital to pay for the services and maintenance? Its not just a case of getting money from the companies wanting to build and taxes. You will eventually be spending more, its obvious. Sure you will get cash in your pocket initially, but you will soon realise this money has run dry and you will be looking into further short term methods to get a quick buck. It only takes a complete and utter blind idiot to decide that money in the pocket is better than a sustainable and more prosperous future.

There are much more sustainable and creative methods that can be utilised. How about you think logically and try to develop on what we already have? For example, encourage local businesses with lower taxes? If this is mainly a housing issue, try to find better ways of fulfilling your requirements rather than trying to take the quick and easy option. There is no reason why further development in urban areas is a problem. Guildford town is not densely populated and it can be easily argued that its land (especially housing areas) has been used inefficiently, especially considering that its supposed to be the main town or city of Surrey.
Now lets talk about the environmental and ecological effect. You are talking about destroying everything that this planet needs to stop taking for granted, and after a few hundred years of destruction, people are starting to realise this. The environment is not just a canvas for development.

I sincerely hope you don't just count these objections, please read them, every one. People are passionate about this matter,

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/804  **Respondent:** 15296545 / Catherine Lees  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object to the proposed Infrastructure Schedule.

The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no schedule for Garlick's Arch (A43), so the Plan takes no account of the infrastructure required for this site. It is therefore not fit for purpose.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/803  **Respondent:** 15296545 / Catherine Lees  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object to the SHMA figure of 693 houses per annum in the borough being too high.

GBC's figures for housing numbers are more than double the historical level. The council's refusal to publish any evidence for this is outrageous and defies local democracy and all notions of transparency. Such practices have no place in a planning consultation. And as such should be rejected until subject to public scrutiny.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
**Comment ID:** PSLPS16/1324  **Respondent:** 15296545 / Catherine Lees  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

I object to the inclusion of the land at Garlick's Arch (A43)

Garlick's Arch is protected from development as Green Belt. There are no exceptional circumstances which allow for it's removal from the Green Belt (Policy P2). Central Government state clearly that housing need is not an exceptional circumstance.

The Plan states the preference is to use of previously developed land, but GBC have replaced a sustainable brownfield site at Burnt Common with Garlick's Arch.

The site is not appropriate because:

- There is no sustainable transport
- The site is liable to frequent flooding
- The site has Ancient woodland and is a wildlife habitat, but no wildlife report for the site is in the
- There are no plans to improve local schools, medical or utilities to cope.
- The Draft Local Plan Infrastructure schedule does not provide for this site at all

Furthermore, no Section 18 consultation took place on this site prior to this site's inclusion in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

**Attached documents:**

**Comment ID:** PSLPS16/1325  **Respondent:** 15296545 / Catherine Lees  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

I object to the inclusion of the land for new on/off ramps at Burnt Common.

The proposed North facing ramps to the A3 at Burnt Common would have disastrous effect on the local communities of Send, Ripley and Clandon (which do need to access the A3 to the north) but the addition will draw in a huge amount of 'through' traffic. For example, all the traffic from London/M25 going towards Woking would go through Burnt Common, Send and Old Woking, which would cause immeasurable damage to these villages.

This is not sustainable as this cannot be improved as these local roads are too confined to have their capacity significantly increased, even if this were desirable, which it is clearly not.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2707  Respondent: 15296545 / Catherine Lees  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the damage to the environment because of the scale of the proposed development.

The Garlick's Arch (A43) proposal would double the built land area in the locality, and would irrevocably damage the local environment. There is Ancient Woodland on the site and this cannot be adequately protected if the site were to be built on.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2710  Respondent: 15296545 / Catherine Lees  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There is no need for new industrial sites at Garlick's Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000 sq m proposed. That site was removed from the Plan without any reasoning.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2711  Respondent: 15296545 / Catherine Lees  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5
Furthermore the development at Garlick's Arch would result in the loss of four existing successful rural businesses, which have been for there decades employing local people and are therefore clearly sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2699  Respondent: 15296545 / Catherine Lees  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure.

The villages of Ripley and Send already suffer from severe congestion for much of the day. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2712  Respondent: 15296545 / Catherine Lees  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of proper infrastructure planning for sites.

The Plan does not identify adequate infrastructure improvements to support the huge scale of development, especially at Garlick's Arch (A43) which has no infrastructure projects in the Infrastructure Schedule to support it. Local services, utilities and sewerage, doctors etc are at or close to capacity.
There are no plans to improve the capability of the medical and police/emergency services to cover the 5000+ houses in the north east of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2713  Respondent: 15296545 / Catherine Lees  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object due to the congestion that development will cause to the trunk roads, A3/M25.

The A3 or M25 would have to be improved *before* any development is done. Highways England has no plans in its current schedule even to start *considering* improving the A3. Many of the main "plans" are "aspirational" (i.e. they have no basis, and should be discounted and excluded.

Clearly no real improvements are possible in the timeframe of this Plan, so the Plan is undeliverable and developments at Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25), should not take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2708  Respondent: 15296545 / Catherine Lees  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to poor air quality concerns.

The huge developments being proposed, particularly in the north east of the borough will lead to considerable further congestion and to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to not protecting the Green Belt

Central government's National Planning Policy Framework requires there to be exceptional circumstances for Green Belt boundary changes and for development within the Green Belt. It also states that housing need is not an exceptional circumstance.

I object to removing Ripley and Send from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick's Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed.

The Plan should develop the existing brownfield site for light industrial use at Burnt Common rather than developing Garlick's Arch (A43).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object the development in areas which are at risk of flooding.

The Plan does not take adequate account of flood risk as required by National Planning Policy.

The site at Garlick's Arch (A43) is identified on the Environment Agency's flood map as being in a Flood Zone 3 from a river (means that it has a 1 in 100 or greater chance of flooding each year - this is the highest risk category). Despite this flood risk, the site has been assessed as part of the Council's SFRA as a Flood Zone 2 (meaning having between a 1% and 0.1% annual probability of river flooding - that is one tenth of the probability assessed by the Environment Agency!).

This site often floods during the winter months and has flooded as recently as this summer 2016. Clearly the Council's SFRA is not fit for purpose and so invalidates the local plan for such sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/2697  Respondent: 15296545 / Catherine Lees  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Local Plan as the development proposed is not sustainable.

13,860 new houses proposed is not sustainable, and not required by the local communities on which they are being inflicted. Many communities, especially Ripley, Send and Clandon would be damaged by over development. The nearest train stations to Wisley Airfield (A35) and Garlick's Arch (A43) are miles away and talk of new railway stations is fanciful. So most houses will have two cars - so another 30,000 cars in the borough! The Plan has nothing to improve the infrastructure for Garlick's Arch.

The development should be in urban areas where there is sustainable transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2706  Respondent: 15296545 / Catherine Lees  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Borough Wide Strategy.

There is too much development in Wisley (A35) Ripley/Send (A43)-and clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

Why doesn't GBC apply any constraints to reduce the overall housing figure as all the other Borough Councils in Surrey do? The figures are not credible.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/806  Respondent: 15297217 / Elizabeth White  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the late inclusion of site A43 Garlicks Arch and the result such a development would have on local schools and GP surgeries.
- I object to the increased traffic that would result from the Garlicks Arch development and the on/off ramp at Burnt Common.
- I object to any removal of villages in the Green Belt.
- I object to inappropriate and massive over development of sites such as Wisley Airfield and Gosden Hill Farm.
- I object to site A45 The Talbot - over development in a conservation area
- I object to the lack of evidence for the alleged housing need numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1328  Respondent: 15297217 / Elizabeth White  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the late inclusion of site A43 Garlicks Arch and the result such a development would have on local schools and GP surgeries.

I object to the increased traffic that would result from the Garlicks Arch development and the on/off ramp at Burnt Common.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1329  Respondent: 15297217 / Elizabeth White  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to site A45 The Talbot - over development in a conservation area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2716  Respondent: 15297217 / Elizabeth White  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to any removal of villages in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2717  Respondent: 15297217 / Elizabeth White  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to inappropriate and massive over development of sites such as Wisley Airfield and Gosden Hill Farm.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/646  Respondent: 15297217 / Elizabeth White  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the lack of evidence for the alleged housing need numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the lack of immediate provision of schools. Children are already suffering from being housed in cramped, 'temporary' classrooms that have been in situ for years.

12) I object to the lack of immediate provision of doctors surgeries which are over subscribed in this area.

13) I object to the lack of immediate provision of dental facilities which are already lacking in this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to our villages, Ripley, Send, Clandon becoming one conurbation and losing their individual identities like those of Molsey, Walton and Hersham which are indistinguishable and the same with Knaphill, St John's and Goldsworth Park.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/15477  Respondent: 15297249 / Christine Gates  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

) I object to the lack of immediate provision of schools. Children are already suffering from being housed in cramped, 'temporary' classrooms that have been in situ for years.

12) I object to the lack of immediate provision of doctors surgeries which are over subscribed in this area.

13) I object to the lack of immediate provision of dental facilities which are already lacking in this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2719  Respondent: 15297249 / Christine Gates  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the destruction of areas that are currently home to natural flora and fauna displacing animals and birds.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2720  Respondent: 15297249 / Christine Gates  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the added noise of traffic that will be created by the increased volume of traffic.

4) I object to the extension of hours of noisy traffic that will be created by people trying to avoid the queues that already build up on A3 and M25. People get up earlier and earlier to get ahead of the traffic jams on these roads.

5) I object to the increased pollution from traffic fumes from extra cars. The pollution levels are already too high, and cause sore throats.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2723  Respondent: 15297249 / Christine Gates  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the increased traffic volume which would cause children, who already take 1 hour to get home from school on the bus between Guildford and Ripley, to take even longer.

9) I object to the danger caused by more cars on roads which are also used by over sized buses. On the narrow lanes of Send the width of the buses cross the center lane demarcation. On blind corners as in Send Marsh, the bus rounds the corner in the same lane as those heading in the opposite direction. Accidents are hard to avoid.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15475  Respondent: 15297249 / Christine Gates  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()
3) I object to the added noise of traffic that will be created by the increased volume of traffic.

4) I object to the extension of hours of noisy traffic that will be created by people trying to avoid the queues that already build up on A3 and M25. People get up earlier and earlier to get ahead of the traffic jams on these roads.

5) I object to the increased pollution from traffic fumes from extra cars. The pollution levels are already too high, and cause sore throats.

7) I object to the disproportionate amount of development proposed for one area of the borough. Already the traffic flow problems around Guildford, Ripley, Cobham, Byfleet are horrendous in rush hour, building up from 3.30 pm and reaching virtual gridlock by 5pm. As residents we already feel imprisoned between 7.30am to 9am and 3.30pm to 6.30pm because the roads are clogged with traffic.

8) I object to the increased traffic volume which would cause children, who already take 1 hour to get home from school on the bus between Guildford and Ripley, to take even longer.

9) I object to the danger caused by more cars on roads which are also used by over sized buses. On the narrow lanes of Send the width of the buses cross the center lane demarcation. On blind corners as in Send Marsh, the bus rounds the corner in the same lane as those heading in the opposite direction. Accidents are hard to avoid.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/15474  **Respondent:** 15297249 / Christine Gates  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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1) I object to the loss of green fields, trees and hedgerows to make way for the buildings and associated new roads which will destroy the visual beauty of the area.

2) I object to the destruction of areas that are currently home to natural flora and fauna displacing animals and birds.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/2718  **Respondent:** 15297249 / Christine Gates  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
<table>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I wish to object to the 2016 Draft Local Plan involving the building of so many new houses in this area. I regard the plan as totally unworkable for the following reasons:

1) I object to the loss of green fields, trees and hedgerows to make way for the buildings and associated new roads which will destroy the visual beauty of the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/2722</th>
<th>Respondent: 15297249 / Christine Gates</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</tbody>
</table>

I object to our villages, Ripley, Send, Clandon becoming one conurbation and losing their individual identities like those of Molsey, Walton and Hersham which are indistinguishable and the same with Knaphill, St John's and Goldsworth Park.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the disproportionate amount of development proposed for one area of the borough. Already the traffic flow problems around Guildford, Ripley, Cobham, Byfleet are horrendous in rush hour, building up from 3.30 pm and reaching virtual gridlock by 5pm. As residents we already feel imprisoned between 7.30am to 9am and 3.30pm to 6.30pm because the roads are clogged with traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/647  Respondent: 15297249 / Christine Gates  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of evidence for the necessity for these huge numbers of houses. Recent houses sold in this area have been bought by Londoners as second homes for investment, not because they need to live here.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1330  Respondent: 15297313 / Susannah Stemp  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As a Burpham resident, I object to the 2016 draft local plan. The proposed developments in the Gosden Hill farm area in particular appear to completely disregard the importance of conserving green belt land. The plan proposes a disproportionate level of development in one area of the borough with a complete lack of evidence for the alleged demand for this amount of housing. Similarly, the plan as it stands contains a lack of specific details about essential infrastructure, especially as there is already a recognised existing deficit.

We have lived in Guildford for a long time and hope to raise our children in the village of Burpham, however if implemented in its current form, this plan will make Burpham unrecognisable from how it is today. I find it very disappointing that this proposal has the potential to significantly change the locality, yet has been put forward with minimal time for consultation with the people who live and work locally to contribute their view.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/2724  Respondent: 15297377 / John Clover  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

subject: local plan shalford, peasmarsh, chilworth

Please note that I object to the plan to remove Green Belt restriction from the above.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1331  Respondent: 15297441 / Michael Rhodes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

My name is [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998].

I wish to object to this development on the grounds of that the size of the development, the fact that it is to be built on contaminated land of a former landfill site which if disturbed could be detrimental to our health and well being.

Send Hills infrastructure is insufficient for such a large development.

We would lose a lovely amenity that is enjoyed by many

I am concerned about the potential flooding risk

I am concerned about Send losing its Green Belt status.
As a resident of Send Hill, I would like to object to the above development of 40 houses and two travellers pitches on the following grounds:

1. The site is an inappropriate location due to the narrow width of the single country road.
2. The proposed land contains documented contaminated landfill waste registered at Guildford BC and could cause danger to health and well being if disturbed.
3. If this land is disturbed, it could have an impact on the geological structure of the area including the water table.
4. The development will have an impact on nature and the ecological structure within the area i.e. Nature reserve.
5. The overall infrastructure within the immediate area is already stretched to capacity.

Overall, this development will have a negative effect on village/community life and would be grateful if my objections could be documented and recorded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I live in Woking but reside in West Horsley each weekend as my father lives in the village, and I wish to object to the proposed plan.

The intended proposal is not appropriate as it will seriously impact on the local infrastructure of the village and the quality of life of the local residents. I strongly object to this development.

It is already extremely difficult to park at Horsley station and the shops and during the week these areas are full with cars and traffic, and any increase would make these areas impossible for local residents to use.

The current medical centre is extremely busy and it takes several weeks to get an appointment and the planned population increase would not be sustainable. The current medical provision in the village would be unable to cope with extra demand.

The waste water network is also unlikely to be able to cope with the demand created by the proposed developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/814  Respondent: 15298017 / Margaret Cousins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/815  Respondent: 15298017 / Margaret Cousins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
1. I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
- failure to correct for errors in the historical data for international migration flows,
- issues with the way it considers students and affordability and
- flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I OBJECT to Gosden Hill development being in the Local Plan. The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/1339  **Respondent:** 15298017 / Margaret Cousins  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

1. I OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)
Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/2762</th>
<th>Respondent: 15298017 / Margaret Cousins</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>1. I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)</td>
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<td>I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.</td>
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<td>The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<th>Comment ID: PSLPP16/2758</th>
<th>Respondent: 15298017 / Margaret Cousins</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>1. I OBJECT to the sustainable employment policy (Policy E1)</td>
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<tr>
<td>If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.</td>
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<tr>
<td>The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.</td>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/2759  **Respondent:** 15298017 / Margaret Cousins  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/2761  **Respondent:** 15298017 / Margaret Cousins  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for over-development/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT(POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2772  Respondent: 15298017 / Margaret Cousins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove "exceptional circumstances."
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2753  Respondent: 15298017 / Margaret Cousins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

1. I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example The Street in West Clandon and Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and West Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from severe traffic congestion. Much of West Clandon is deemed by Guildford Borough Council to be a Conservation Area and we residents are required to abide by those rules. Is not GBC also duty bound to protect and conserve the area? Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon, The Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles have, of necessity, to mount the pavement. With a primary school, two
pubs and a children’s playground, quite clearly the village should be protected from, and not be forced to take yet more, traffic.

...

10. I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2763  Respondent: 15298017 / Margaret Cousins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

11. I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2756  Respondent: 15298017 / Margaret Cousins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’) and the land to be taken from the Green Belt. Once taken Green Belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.
Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: PSLPP16/2757  
Respondent: 15298017 / Margaret Cousins  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: PSLPP16/2754  
Respondent: 15298017 / Margaret Cousins  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2755   Respondent: 15298017 / Margaret Cousins   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the Borough Wide Strategy (Policy S2)

2. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

3. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

4. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.
These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans.

But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1345   Respondent: 15298497 / John David Scott   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch is protected from development as Green Belt. There are no exceptional circumstances which allow for it’s removal from the Green Belt (Policy P2). Central Government state clearly that housing need is not an exceptional circumstance.

The Plan states the preference is to use of previously developed land, but GBC have removed a brownfield site at Burnt Common replaced it with Garlick’s Arch.

The site is not appropriate because:

• There is no sustainable transport infrastructure.
• The site is liable to frequent flooding
• The site has Ancient woodland and is a wildlife habitat, but no wildlife report for the site is in the Plan.

There are no plans to improve local schools, medical or utilities to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1348   Respondent: 15298497 / John David Scott   Agent:
I object to the employment strategy and impact at Garlick’s Arch (A43) (Policies E2 and E5)

There is no need for new industrial sites at Garlick’s Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000 sq m proposed. That site was removed from the Plan without any reasoning.

Furthermore the development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been for there decades employing local people and are therefore clearly sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

1. I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

North facing ramps to the A3 at Burnt Common would be a disaster for local communities, which do need to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic. E.g. all traffic from London/M25 to Woking would go through Burnt Common, Send and Old Woking. This is not sustainable as this cannot be improved. This will impact massively in relation to quality of life and safety, pollution and noise.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. **I object to the damage to the historic environment as a result of the scale of the proposed development** (Policy D3)

The Garlick’s Arch (A43) proposal would double the built area in the locality, and would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<tr>
<th>Comment ID:</th>
<th>PSLPP16/2776</th>
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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ( )

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ( )

1. **I object to the lack of proper infrastructure planning for sites (Policy I1)**

The Plan does not identify adequate infrastructure improvements to support the huge scale of development, especially at Garlick’s Arch (A43) which has no infrastructure projects in the Infrastructure Schedule to support it. Local services, utilities and sewerage, doctors etc. are at or close to capacity.
There are no plans to improve the capability of the medical and police/emergency services to cover the 5000+ houses in the north east of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2783  Respondent: 15298497 / John David Scott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

The A3 or M25 would have to be improved before any development is done. Highways England has no plans to even start considering improving the A3 before 2020. Clearly no real improvements are possible in the timeframe of this Plan so the developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), should not take place.

I wish these objections to be fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2780  Respondent: 15298497 / John David Scott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to poor air quality concerns (Policy I3)

The huge developments being proposed, particularly in the north east of the borough will lead to considerable further congestion and to greater levels of air pollution, which will have a detrimental effect on local residents and their health, including mine and my family’s.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>1. I object to not protecting the Green Belt (Policy P2)</td>
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<tr>
<td>I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.</td>
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<td>The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick’s Arch (A43).</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>4. I object to development in areas which are at risk of flooding (Policy P4)</td>
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<tr>
<td>The Plan does not take adequate account of flood risk as required by National Planning Policy.</td>
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<td>The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2016).

These are my main reasons/ I object on these grounds / …

1. I object to the Local Plan as the development proposed is not sustainable (Policy S1)

13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve the infrastructure for Garlick's Arch.

The development should be in urban areas where there is sustainable transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPA16/824  **Respondent:** 15298849 / Elaine Burns  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

**POLICIES A37, A38, A40 & A41, located in West Horsley**

The LAA identifies six sites in West Horsley for potential development, the four largest having allocation policies within the Proposed Submission Local Plan. The total housing number arising from these six sites is 405 homes in total. For a village which had 1,124 dwellings at the 2011 Census, this represents a proportional increase of 36% over the plan period, an enormously high proportion by any standards.

It is also contrary to the opening statement of Local Plan Policy P2 that “We will continue to protect the Metropolitan Green Belt” It seems that in West and East Horsley at least the draft Local Plan is doing exactly the opposite.

Given the scale of the development proposed in West Horsley, the inevitable destruction of its village character and the impact on infrastructure across West and East Horsley, I object to the site allocation policies A37, A38, A40 and A41.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/1362  **Respondent:** 15298849 / Elaine Burns  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

**POLICY A35: Land at former Wisley Airfield**

Policy A35 proposes approximately 2,000 homes to be built on the site of the former Wisley Airfield. This will lead to the creation of the largest settlement in Guildford Borough outside of Guildford town. In effect it is proposing to create a New Town in the heart of the Surrey Green Belt.

I consider this proposed development to be a severe contravention of Metropolitan Green Belt policy. It will result in a New Town being created of very low sustainability which will have a major adverse impact on infrastructure across a widespread area, including East and West Horsley.

It will impact on the sewage system, already at capacity, on the two railway stations where daytime parking is at capacity and on the shops of East and West Horsley where parking is nearing capacity, on the roads/lanes already severely damaged and narrow, on the medical services available and on the wildlife of the area.

Above all it will cause irreversible destruction to the character of one of the most picturesque and historic areas of the country. I object to policy A35
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1360  Respondent: 15298849 / Elaine Burns  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A36

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

SITES POLICIES

POLICY A36: Hotel, Guildford Road

Policy A36 proposes to re-develop the current Thatcher’s Hotel for housing.

I object to the loss of this long-standing village hotel and significant employer. The site is also close to the East Horsley Conservation Area and housing designs and site configuration must reflect the sensitivity of this setting.

The number of houses proposed for this site - approximately 48 dwellings, an implied gross housing density of 37 dwellings per hectare, which is exceptionally high for this location.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1361  Respondent: 15298849 / Elaine Burns  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A39

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY A39: Land behind Ockham Road North, near Horsley railway station

Policy A39 proposes a housing development of some 100 dwellings on a 5.7 acre green-field Green Belt site behind the houses on the western side of Ockham Road North. Access is to be secured by demolishing the first two houses next to the railway bridge.

There are no ‘very special circumstances’ to justify housing development on this site. I object to Policy A39.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/2797</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

DESIGN POLICIES

POLICY D3: Historic environment

East and West Horsley contain a wide range of heritage assets which make an important contribution to the look and feel of the village and its character. I fully support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/2798</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY D4: Development in urban areas and inset villages

I support this design policy, although not the proposal of Policy P2 to inset East and West Horsley from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
## ECONOMY POLICIES

**POLICY E8: District centres**

I support this policy, including the designation of Station Parade, East Horsley, as a District Centre under the draft Local Plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>Comment ID:</th>
<th>PSLPP16/2796</th>
<th>Respondent:</th>
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**POLICY E9: Local centres**

I support this policy, including the designation of Bishopsmead Parade, East Horsley, as a rural Local Centre under the draft Local Plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>Comment ID:</th>
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**Policy H2**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
HOUSING POLICIES

POLICY H2: Affordable Homes

I support the general principle that developers should be required to contribute part of their development profit towards the cost of social housing in the borough. However I object to this policy as GBC have taken no regard to the differences in affordable housing need across the borough. Under Policy H2, 40% of all but the smallest development sites in East and West Horsley will be required to have affordable housing built upon them, irrespective of whether there is actually demand for more social housing in that area. Moreover, the affordable housing targets proposed in the Proposed Submission Local Plan indicate that the biggest component of affordable housing (40%) should be built as 1-bed dwellings despite the fact that GBC’s own studies show that the strongest affordable demand in the borough is actually for larger 3-bed dwellings.

As a result of this flawed affordable housing policy, a significant volume of social housing is likely to be built in places where it is not needed and offered to tenants who do not want to live there nor have jobs near that location.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2799  Respondent: 15298849 / Elaine Burns  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

INFRASTRUCTURE POLICIES

POLICIES I1, I2 & I3

I object to these policies as there are serious deficiencies and shortcomings in the infrastructure of Guildford Borough as it is today and that the aggressive housing policy as proposed by GBC in the Proposed Submission Local Plan will exacerbate this problem.

Roads across the Horsleys are in poor condition with many potholes. Many roads are unable to sustain their current levels of traffic, particularly the increasing levels of HGV traffic.

The principal through roads are narrow and winding, have a series of pinch points, have sections without any pavements and are generally unlit. They are really lanes not roads at all.

Many of the drains are blocked or otherwise in poor condition giving rise to frequent surface water flooding when it rains.

The pavements are in poor condition. As well as being narrow, they are often uneven and/or cracked making it difficult, for example, for people with pushchairs or prams or in wheelchairs.

There are insufficient school spaces for the number of local children needing them, with the result that children are often allocated to schools a significant distance away such as Dorking or Woking.

The Medical Centre in East Horsley is already at capacity in terms of its number of patients.
The Horsleys are served by a single primary school, The Raleigh, in West Horsley. Planning guidance suggest that this number of new homes will require the provision of around 150 additional primary school places to accommodate such an increase in population. Today there is no spare capacity at The Raleigh, yet no proposals are made in the Proposed Submission Local Plan to provide for any more schooling in the Horsleys.

I believe that the failure to address the inadequacies of the existing infrastructure to meet the needs of what is there already is a serious deficiency in the Proposed Submission Local Plan.

I therefore object to the infrastructure proposals on these grounds

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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PROTECTING POLICIES

POLICY P1: Surrey Hills Area of Outstanding Natural Beauty (‘AONB’)

The Surrey Hills AONB is one of the great treasures of Guildford Borough and I believe that protecting this area should be given the highest priority.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY P2: Green Belt

Local Plan Policy P2 states that: *We will continue to protect the Metropolitan Green Belt.* I support this policy.

Yet GBC appears to be in breach of this policy itself through the housing policies that it has set out in the Local Plan as around 65% of the developments proposed in the Proposed Submission Local Plan are to be built on land currently within the Metropolitan Green Belt. This is outrageous.

Proposal to inset East and West Horsley from the Green Belt and make Settlement Boundary Changes

I object to these proposals

East and West Horsley are set in a rural location and have the look and feel of a rural villages. Green Belt status has been a key factor in preserving that character. GBC attributes the need to inset East and West Horsley to NPPF requirements, arguing that the test for remaining ‘washed over’ is that the village should make an important contribution to the openness of the Green Belt. This both Horsleys clearly do as around a third is composed of woodlands. Woodlands and large residential gardens make a vital contribution towards biodiversity, provide wildlife corridors, and furnish those open spaces which are vital to the character of the greenbelt. It is one thing for a planner to study a map and see a settlement area filled with housing, but it is quite another actually to come to rural villages like the Horsleys and see how the Green Belt has preserved their rural character and openness.

Today East and West Horsley are picturesque and flourishing rural communities, which continue to experience steady incremental growth as a result of being ‘washed over’ by the Green Belt.

Proposal to remove Wisley Airfield from the Green Belt

I object to the proposal to remove Wisley Airfield from the Green Belt. The only justification for this proposed change is unfulfilled housing need which is not considered an exceptional circumstance.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Answer (if comment is on questions 1-7 of the questionnaire): ()

re Proposed Submission Local Plan

I have serious concerns about the local plan and the evidence and assumptions that support it, consequently I have serious objections to many of the policies listed. I do not agree with the scale of the house building programme which is being proposed by GBC. The target outlined represents a 25% increase in the housing stock of the borough, yet the Office of National Statistics (“ONS”) projects a population increase of only 15% for Guildford Borough over this same period.

I also note that the Proposed Submission Local Plan includes the statement “*We will continue to protect the Metropolitan Green Belt*”. I fully support this policy. However, GBC appears to be in breach of this same policy through the housing
policies it has set out in the Proposed Submission Local Plan, whereby some 65% of developments will be made on land that is currently Green Belt.

I am also concerned that the infrastructure proposals are inadequate even to meet the needs of what is there at the moment, nevermind the proposed developments in the Local Plan.

**POLICY S2: Borough Wide Strategy**

I **object** to the policy of adding 13,860 new homes to Guildford Borough over the 2013-2033 period of the Proposed Submission Local Plan, equating to an annual build of 693 new homes per annum.

I have serious concerns about the enormous scale of this building programme, which represents a net increase of 25% in the housing stock of Guildford Borough. Yet the official statisticians at the Office of National Statistics (“ONS”) are projecting a population increase of some 15% for Guildford Borough over this same period.

I believe GBC has voluntarily chosen to pursue a policy of aggressive civic and economic expansion which underpins all of the housing policies in the Local Plan. In short, the difference between the official statisticians’ forecasts and GBC’s target of a 25% increase in housing stock is entirely down to a political choice made by GBC.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the development of Wisley airfield still being in the Local Plan. GBC gave 14 reasons to reject this application so it should not be in the Local Plan still.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The Local Plan has made no concessions to the problems of infrastructure. The narrow lanes of East and West Horsley will be unchanged and the railway station carpark cannot be increased to take more cars.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1507  Respondent: 15298849 / Elaine Burns  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the high number of homes proposed. The overall reduction in the borough is only 5.6% and 12,426 homes is still excessively high and probably no longer justified.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1353  Respondent: 15298881 / Mela Davidson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

While visiting Compton yesterday I found a rather emotive flyer tucked under my car windscreen and wish to respond.

The development appears well planned and aimed at providing affordable housing and facilities for real working people who are the backbone of our society. They deserve somewhere to live, too.

I have recently spent quite a bit of time in the Royal Surrey Hospital and people such as nurses deserve to have affordable, attractive and convenient housing. They may be having long commutes from out of the area to work at the hospital now and so their cars are already causing pollution which would be lessened if they were able to live and work locally.

The university is a vast contributor to the economy of Guildford as well as having a growing international importance and there should be suitable housing for its employees too.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We are writing to you to express our objection to the following plans for Send Village and the surrounding area:

**We object to Send village being removed from the Green Belt:**

As Send residents, we object to our village being removed from the Green Belt. The Green Belt was intended to be permanent and we have received local election assurances that promised this would be the case. Clearly this promise will not be upheld if the LP goes ahead. Our Green Belt is any area of natural beauty and keeps the towns of Woking and Guildford separate, divided by locally valued countryside.

**We object to the building of 45 new houses at Clockbarn Nursery:**

The access to this site is via Tannery Lane, a narrow single track country lane that is not designed for volumes of traffic. Planning permission has already been given for a number of apartments and a marina. This road will struggle to cope with the increase of traffic associated with these developments. Further traffic down this road will greatly increase the risk of accidents. The junction with Send Road is also already dangerous for drivers and cyclists joining the main road.

**We object to the building of 400 houses and a 7,000sq metre industrial space at Garlick's Arch:**

This Green Belt site is prone to flooding. Send has several flood plains which help keep our houses dry during exceptionally wet winters. By filling such a large site with an enormous base of concrete, this will surely put local residents at a higher risk of flooding - including the new proposed homes. It's essential that brownfield sites are utilised to their full potential before a Green Belt site is even considered. Expansion at Slyfield is one possibility for increasing industrial space in the borough.

**We object to the building of 40 new homes and 2 traveller's pitches at Send Hill:**

This location is accessed via narrow roads that make access for a volume of traffic hazardous. The roads are totally unsuitable for large vehicles such as caravans. This site also contains unsafe landfill waste (which Guildford Council is aware of) and is also an area of beautiful countryside. We believe this site should not be disturbed.

**We object to a new interchange with Burntcommon and the A3:**

This new interchange would have to handle the traffic for the huge number of proposed houses at Wisey Airfiled, Blackwell Farm, Burpham and Gosden Hill. Much of this traffic to and from the A3 would pass through Send. The road that runs directly past our house (Send Road) would become congested during rush hour and pollution and noise levels would increase significantly. This road is already very busy and current noise and pollution levels are already excessive.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</th>
</tr>
</thead>
<tbody>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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</tbody>
</table>

1. I OBJECT to the lack of any evidence for the alleged housing need numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/1586  Respondent: 15299041 / Elizabeth Teece  Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25</td>
</tr>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
</tr>
</tbody>
</table>

1. I OBJECT to site A25 Gosden Hill Farm overdevelopment of 2000 homes in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/1588  Respondent: 15299041 / Elizabeth Teece  Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
</tr>
</tbody>
</table>

1. I OBJECT to site A35 Wisley Airfield - 2000 homes that are totally inappropriate and unsustainable development in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/1581  Respondent: 15299041 / Elizabeth Teece  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to building 45 houses at Clockbarn Nursery. How is Tannery Lane to cope with this added traffic. The junction with Send Road is already very dangerous.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1583  Respondent: 15299041 / Elizabeth Teece  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the development of 400 houses and 7000 sq metres of industrial space at Garlick's Arch, opposite Send Marsh Road. To build on a site that floods and is covered by ancient woodland is beyond belief. The 7000 sq metres of industrial space is not needed. If it is then it should be at Slyfield.

1. I OBJECT to the late inclusion of site A43 Garlicks Arch.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1585  Respondent: 15299041 / Elizabeth Teece  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I OBJECT to a new interchange with the A3 at Burnt Common because Send would have to take traffic from the proposed 2000 new houses at Wisley Airfield, 2000 houses at Gosden Hill Burpham and 1850 at Blackwell Farm. Much of this traffic to and from the A3, M25, Woking and Guildford would go through, Send and Send Road which is already overloaded with traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1584  Respondent: 15299041 / Elizabeth Teece  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

5. I OBJECT to the development of 40 houses and 2 travellers' pitches at Send Hill. This is an inappropriate location because the narrow width single access country road provides insufficient access.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1589  Respondent: 15299041 / Elizabeth Teece  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to site A45 The Talbot - This is overdevelopment in a conservation area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1590  Respondent: 15299041 / Elizabeth Teece  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to site A57 The Paddocks - 4 travellers pitches.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3534  Respondent: 15299041 / Elizabeth Teece  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

With regard to the 2016 Draft Local Plan I have the following OBJECTIONS.

Please show MY OBJECTIONS to the Planning Inspector.

Please confirm that you have received my email listing MY OBJECTIONS as follows.

1. I OBJECT to Send Village being removed from the Green Belt. Local councillors and central government gave a clear election promise to protect the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3536  Respondent: 15299041 / Elizabeth Teece  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
13. I OBJECT to the removal of any villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3535  
Respondent: 15299041 / Elizabeth Teece  
Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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1. I OBJECT to the disproportionate amount of development in one area of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/827  
Respondent: 15299105 / Michael Saunders  
Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We wish to object to the plans to remove Send village from the Green Belt.

We Object to building 45 houses at Clockbarn Nursery, Tannery Lane is totally unsuitable due to lane being narrow and the junction to Send Road is already dangerous.

We Object to building 400 hundred houses on Garlick's Arch.

We Object to 40 houses and two travellers pitches in Send Hill.

We Object to the new interchange with the A3 at Burnt Common because of the extra traffic this will bring to the roads in Send which are already overloaded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am a resident of Normandy village and I feel compelled to write to you with my objections to the proposed development in our village.

I object strongly to the building proposal as we are a small village with a mixed demographic in ages we do not have the requirement for a secondary school in our village and for at least the next 11 years the majority of pupils would be required to commute into the site. This would put both the rail transport and the roads (which are single traffic roads) under immense pressure. In conjunction to this to walk either way on Glaziers Lane or Westwood Lane there is not a continuous pavement if you walk from the station to the new entrance on to the proposed site you need to cross Glaziers Lane 3 times, this without the aid of any crossing patrol, to meet these requirements you would then hold up traffic travelling from Worplesdon, Wood Street and Pirbright travelling towards the Hogs Back. There are other secondary schools in this area with the capacity and traffic links to accommodate these pupils.

In addition to this I object as the size of the housing development as it is disproportionate to the size of our village doubling its population without giving any thought to the quality of anyone's life. This is a purely for profit development. It does not take into consideration the transport issues that another 2,000 adults and 1,500 secondary pupils will cause. The expansion of the road network is not possible and the stress on the 2 bridges for the railway one which is single file traffic only would bring both noise, pollution and congestion. We also have close links to the Thames Basin Heath Protection Area and a development of this magnitude will cause damage to the wildlife we work hard to preserve.

I also object as I feel that our health provision in this area would be totally inadequate. We have a doctor's surgery at Manor Fruit Farm which would be unable to deal with another 2,000 residents at its current size and there is no thought to enlarge the site. Also our A&E department and other facilities at The Royal Surrey Hospital would need enlargement to cope with this size influx. Neither of these points have been provided for with any cash provision.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
My objections to A47 plans Which have been resubmitted for approval by Guildford Borough Council.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to Guildford Borough Council’s draft Local Plan proposal to build 1,800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:-

• destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
• remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
• increase tailbacks on the A31 and traffic congestion
• result in ra-running through local roads
• add to Guildford's pollution

In summary and to reiterate, I object to the above plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

POLICY A26 BLACKWELL FARM

I object to policy A26 Blackwell Farm There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints. Blackwell Farm is located entirely within the green belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Blackwell Farm performs all five functions of green belt, and fulfils purposes 1, 3 and 5 very strongly. Purpose 1 - “checking the unrestricted sprawl of large built-up areas”. There is huge pressure to develop on the western edge of Guildford; the University of Surrey has stated publicly that its key objective is to develop the whole of its landholdings, stretching west to Flexford Farm. This, combined with the indefensible boundary being proposed (a hedgerow rather than the existing belt of ancient woodland), will put more of the
green belt and the Surrey Hills Area of Outstanding Natural Beauty (AONB) at risk of future development. Purpose 3 “assists in safeguarding the countryside from encroachment” - the proposed movement of the green belt boundary on the west of Guildford to allow for development of the University in 2004 resulted in the encroachment on countryside and the loss of working farmland (including some Grade 2) at Manor Farm. The proposed future change in the boundary would result in further encroachment and the loss of farmland including further Grade 2. The proposed road development with access road from the A31 would also effectively cut off farm access to the south of the development area leading to further urban influence on this countryside. The University’s stated key objective is to develop land, which includes Chalkpit and Wildfield farms leading to the risk of further boundary change and further encroachment in future years. Purpose 5 - “assists in urban regeneration by encouraging the recycling of derelict and other urban land” Whilst all green belt assists towards this purpose, the ownership of this land by the University of Surrey with its extensive landholdings within the urban boundary (including land it leases to the Hospital and Holiday Inn, the Surrey Research Park, Hazel Farm as well as two large campuses) means that the location of Blackwell Farm within the green belt plays an even greater and direct role in encouraging the more efficient usage of urban land. Stopping development on Blackwell Farm would result in the University of Surrey investing in, and regenerating, land in its ownership and delivering its commitments following the 2003 boundary review (including 270 homes for key workers, 3,125 student residences and releasing further accommodation at Hazel Farm). The University has 17 hectares of surface car parking that could be built over with offices and flats. This is a more sustainable option than building over open farmland (largely grade 2 and 3a) within the green belt. The Blackwell Farm development would result in harm to the Surrey Hills Area of Outstanding Natural Beauty (AONB), harm to an Area of Great Landscape Value (AGLV), and harm to the setting to the AONB. (Blackwell Farm forms the views into and out of the Hogs Back ridge). The NPPF is clear that AONBs should be afforded the highest level of protection in relation to landscape and scenic beauty. All development proposals within and adjacent to the AONB must conserve or enhance its special qualities. The NPPF also makes it clear that applications for major development in the AONB will be refused unless exceptional circumstances are demonstrated and the development is proven to be in the public’s interest. Guildford Borough Council has not shown that the proposed housing development or the extension of the Research Park, or the proposed link road from the A31 to Gill Avenue, is in the wider public interest. Indeed, the increased traffic through the already congested Egerton Road/Gill Avenue junction, which would result from the development, would impede emergency vehicles travelling to the Hospital and this would be very much against public interest. GBC’S Policy P1 states that, “The Surrey Hills Area of Outstanding Natural Beauty (AONB) will be conserved and enhanced to maximise its special landscape qualities and protect it from inappropriate development. All proposals will be considered against whether they conserve and/or enhance the setting and views of the AONB”. I question how the proposal to carve a new two-lane carriageway through the AONB fits this policy, or meets para 115 of the NPPF? Finally, nearly the whole site has been identified as a “candidate area” for AONB status in the Landscape Evaluation Study commissioned by Compton, Worpleston and Wanborough parish councils. Therefore, the entire site should be treated as though it is within the AONB during this local planning process. The access to the proposed Blackwell Farm site will put additional peak hour pressure on two of Guildford’s worst congestion “hot spots”: the A31 (Hog’s Back) and the Tesco Roundabout on Gill Avenue. GBC’S proposal to create a new major route into Guildford from the west at, or close to, the Down Place private driveway, and to make this the main access to the planned Blackwell Farm development, does not appear to have been thought through. There are queues stretching back from the Farnham Road Bridge as far as the Down Place driveway entrance most weekday mornings and any traffic generated by the new development would not be able to clear the junction. In order to accommodate the volume of traffic using the new junction (generated by residents of the new housing estate, employees at the Surrey Research Park, Hospital and University, and visitors to the new school/supermarket), there would almost certainly need to be a roundabout (rather than the proposed traffic-light controlled junction) and GBC has ruled out a roundabout on grounds of landscape impact and traffic. The secondary access to the site at Gill Avenue also presents problems, and as GBC states in its Transport Assessment (14.9.5), changes planned for the Tesco roundabout will not mitigate against the increased level of traffic through the junction as a result of the Blackwell Farm development, and this in turn will impact on the Egerton Road/Gill Avenue junction, which serves the Royal Surrey County Hospital. I question whether it is responsible to allow a development that would impede emergency access to an A&E department and a major incident unit. The traffic impact resulting from the development of Blackwell Farm on the strategic road network would not appear to be properly assessed but it would be alleviated in part (but not completely) by widening the A3. However, timing and funding for this work is unclear so there would be many years of traffic chaos before any widening took place (if indeed it does). More significantly, the widening of the A3 would create noise and environmental impact on the neighbouring residential areas of Onslow Village and Beechcroft Drive and a six-lane highway would cause greater severance between Guildford and Blackwell Farm and areas to the west. The NPPF states in Section 6 para 47 that local authorities should “identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15”. In a footnote to this, it further adds, “To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably
developed at the point envisaged.” I consider that the proposed access arrangements to Blackwell Farm are wholly inadequate for a development of this scale and thus the site cannot be “viably developed”.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6718  Respondent: 15299201 / Samira Abdullah  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A55

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of land from Greenbelt for the provision of two traveler pitches on Puttenham Heath Road to 'enable delivery'. The area warrants Green belt status and should remain in Green Belt. Removal is a big step towards the eventual development of permanent accommodation, which would result in loss of the two pitches.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14224  Respondent: 15299201 / Samira Abdullah  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy D1 Making better places I object to the absence of any reference to vernacular or historic design guidelines, even in Conservation Areas. Most of the borough, especially the rural areas, has vernacular design guidelines that are available to give suggestions as to appropriate design. These should have mandatory planning force. The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design? Should it not result in better-designed buildings?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14096  Respondent: 15299201 / Samira Abdullah  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2
I object to Policy D2 Sustainable design, construction and energy. Sustainability should be an overarching ambition, conditioning the whole local plan and running through it, as claimed in the NPPF, “like a golden thread”. It should be set out clearly in Policy S1, not buried away as a minor detail in Policy D2. This policy amounts to “greenwashing”, expounding aspirational environmental targets while ignoring the plan to build dormitory towns across the Green Belt that are environmentally and socially unsustainable. These settlements will bring vastly increased car use and will lead to unacceptable traffic congestion, overstretched social infrastructure, and more greenhouse gas emissions, noise and light pollution. This policy should not be just about saving energy but about preserving the borough’s stock of natural capital, especially the countryside, from attempts to rig the housing market. This policy’s emphasis on Combined Cooling Heating and Power and communal heating networks is difficult to understand, since no such networks are available locally.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14229  Respondent: 15299201 / Samira Abdullah  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy D3 Historic Environment

This policy clashes with the strongly pro-development agenda of the rest of the plan and fails to address the contradiction. History is unamenable to improvement, so the policy should commit the Council firmly to protecting and preserving our heritage assets from development. Instead, the specific policy pledge to “support development” that might “enhance” heritage assets leaves wide scope for abuse in the form of destructive commercialisation and financial leveraging of relevant sites. This policy is based on the false premise that Guildford’s heritage is inherently in decay. This is a developer’s charter – a short step away from the idea that the historic environment needs to pay its way to be preserved. The Council’s reviews of Guildford Museum and the Electric Theatre support this interpretation. Whatever the “reasoned justification”, the actual policy wording in the blue box leaves too many loopholes. Development close to historical assets is harmful and should be expressly prohibited. This policy fails to meet the requirements of NPPF paragraphs 126 and 131-133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14229  Respondent: 15299201 / Samira Abdullah  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy D4 Development in urban areas and inset villages This policy that does not address the opportunity for building in the urban area The plan envisages that 40% of homes built will be “affordable”, but this does not provide any accommodation for low-paid workers, for example, those on the minimum wage, who cannot afford to buy so-called “affordable” homes or pay an “affordable” rent. There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low-paid workers such as those employed in the retail, warehousing and distribution sectors (all of which this plan aspires to expand). The number of homes planned in the urban area is much too low. There is a glaring need for regeneration in many urban areas, particularly Guildford Town Centre but this is ignored in favour of building homes on green-field sites instead. This will not address urban housing needs. It is also unsustainable, since building outside the town does disproportionate harm to road traffic, air quality and overstretched infrastructure. The plan envisages a large expansion of the retail sector, but this is hard to justify because the sector is in rapid and continuous decline.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14230  Respondent: 15299201 / Samira Abdullah  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

THE BROWNFIELD OPPORTUNITY Yes, we need a new Local Plan for our borough in order to provide a development strategy within which we can accommodate our local housing, economic and environmental needs. But first we must make good use of our urban brownfield before we consider building in the Green Belt or countryside. Paragraph 80 of the NPPF clearly states that Green Belt serves a key purpose, “to assist in urban regeneration, by encouraging the recycling of derelict land and other urban land”. In order to comply with central planning policy we need a brownfield strategy that states clearly. “We are committed to a brownfield first initiative whereby all applications on previously developed land are given fast track priority and every facility to promote development for residential purposes and employment purposes in order to satisfy the needs of local people. In parallel a low CIL incentive should be given for all residential development on brownfield land. In response to the detailed objections received in the Regulation 18 process of the 2014 Local Plan and also in accordance with government policy a Guildford brownfield land register should be urgently compiled showing address, ownership, occupier, current use and detailed planning brief. Perhaps someone could be appointed at GBC with a clear briefing to deliver brownfield targets of housing and employment space. GBC needs to accelerate the residential redevelopment at Woodbridge Meadows, Walnut Tree Close and the Station within the next 5 years. GBC needs to examine the residential development opportunity of the 25.7 acres of car parks in GBC ownership. I do not consider that the target of 1,172 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core by increased economic impact. The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015 which has recently been adopted by GBC. The reality is that the Town Centre has the capacity for significantly more homes. See details on GGG website - Guildford Greenbelt Group
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to policy E1 sustainable employment. I note that there is a significant reduction of between 71% and 79% in the previous job target and resultant 79% reduction in employment space in response to the many objections lodged in 2014 against an unsubstantiated agenda for economic expansion in the last draft and based on new findings by Aecom in the latest ELNA 2015. I have concern as to the ill-informed clustering of all B classes in terms of the clarity of market evidence required to inform effective planning and a failure to provide a clear understanding of business needs required under Section 160 of the NPPF. I also note the dramatic reduction in assessed demand by two Employment Land Needs Assessment Reports carried out under the same terms of reference within a period of 2 years which calls into question the general reliability of the process of collection and interpretation of data in the overall forward planning process by GBC. I am concerned however that the research undertaken by Aecom is generally superficial and lacks sufficient detail and analysis between B1a, B1b, B1c, B2 and B8 use classes and that no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of office, research and development, light industrial, general industrial and warehousing and distribution floor space. No proper analysis has been made of data held by GBC in respect of different B classes in terms of planning applications granted or evidence gathered by the economic development function at GBC and no robust assessment of local market demand apart from fairly brief references to freely available market research undertaken by commercial estate agents such as Lambert Smith Hampton covering a much wider area. GBC appear to fail to appreciate the fundamental rationale of the Use Classes Order as a planning tool in terms of useful property market research or forward planning. What we are left with is a fairly clumsy and poorly informed plan which clusters B classes without any appreciation of widely different employment impact and economic sustainability. E.g. B1 generates at least 5 times as much employment as B8. The lack of appreciation as to the opportunity for widely different uses being generated within B class clusters defeats the whole point of proper planning of employment uses and can significantly endanger previously good planning put forward in the previous 2003 plan. E.g. the creation of a research and development park linked to the University but now has the threat of being downgraded into a general business park (see below). Little regard has been given in the plan to the economic reality of falling demand for B2 industrial space which is clustered with other B classes almost randomly throughout the plan. Little regard is given to the opportunity of B1 b space as an opportunity for research and development which needs to be nurtured and preserved without the detrimental and confused clustering with other B classes both in terms of planning and promotion of a research hub. I note that the past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 derived from VoA analysis and that the calculated annual floor space demand is 0.7% over the plan period up to 2033. I support the concept of seeking increased investment in our local knowledge-based, high technology economy. This will provide well paid, creative jobs and generate the funding necessary to pay for the infrastructure and environment this sort of industry requires. We need to distinguish between wanting to increase the added value of the economy and physical expansion, especially given the scarcity of land in Guildford. Guildford is not the place for large space hungry businesses. So I should target high added value small and medium sized enterprises rather than the headquarters of larger corporations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to policy E2 location for new employment floor space. I object to the policy of expanding the Research Park onto Blackwell Farm and I do not believe there are exceptional circumstances to justify incursion into this permanent and high quality area of Green Belt. The Surrey Research Park currently extends to 65,000 sq m. There is already granted consent to expand to a further 9,000 sq m (14%). The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis. The ELNA 2015 calculated annual floor space demand is 0.7%. The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period. The necessary growth in floor space over the plan period is therefore 17 years x 0.7% = 11.9%. There is currently 14% expansion space already available. The proposal by GBC to expand the 65,000 sq m by 9,000 sq m (existing allocation) with an additional 35,000 sq m amounts to an increase of 67% of the Research Park which is not required. The Research Park is currently developed at a density of 25% plot ratio. The majority of existing buildings are 2 stories giving a developed floor space plot ratio of 12.5%. The existing Research Park has the opportunity to markedly increase its density without infringing any Green Belt land nearby. Any density increase would be cost effective for the use of all existing infrastructure and would also have the potential to match the existing densities of existing academic buildings on the university campus which are three to four times higher. Together with the existing expansion of 14% through existing consents and the opportunity to increase its density the Research Park has ample capacity to expand to embrace new demand for B1b uses linked to the university. A preferred location for increased B1a and B1b space would be in the Town Centre close to housing and a convenient transport hub.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to Policy E3 maintaining employment capacity I object to the ill-informed policy of resisting change of use from B1a to residential because it flies in the face of positive property market solutions for the regeneration of brownfield land. It is also contrary to current government policy which has recently been reaffirmed and permits a change of use from B1a (offices) to C3 (residential). I believe that the existing government policy which has recently been made permanent of allowing change of use from B1a to C3 is sound. Many office buildings reaching an age of more than 30/50 years become redundant in terms of energy compliance making them illegal to occupy for employment purposes and the cost of refurbishment makes them redundant and uneconomic. The reality of market demand is that the gross development value of refurbished residential space is in excess of the gross development value of refurbished old office space in many locations (this gross development value assessment is supported by the analysis by property consultants GVA in the supporting evidence within the Allies and Morrison Masterplan for Guildford dated 2015). To resist change from B1a to C3 is contrary to the concept of brownfield first for residential development schemes. To resist change from B1a to C3 in Strategic or Significant Employment Sites is contrary to the concept of integrated mixed use communities whereby the journey to work is minimised. London has led the way with significant residential schemes being created from redundant office stock. A good example is the South Bank in London adjacent to Waterloo Station where in 2005 the Shell Centre has been converted into flats. Another early example is the 2000 scheme at Metro Central Heights at Elephant and Castle where the old Alexander Fleming House was converted to 435 flats by St George. GBC needs to adopt more modern trends and policies.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:


Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy E4 Surrey research Park. I support the maintenance of research, development and design activities, in any science, including social science, that is complementary to the activities of the University of Surrey at the Surrey Research Park. I object however to the completely unnecessary expansion of the Research Park into a larger Business Park. I believe that the planning policy going forward for the Surrey Research Park should be to maintain and enhance the integrity of its research base allowing for the economic value add to the local economy of knowledge and technology transfer from the University. I believe that B1b (should be the primary use class for the Research Park and that applications for B1a should be resisted due to the danger of dilution of the core purpose and reputation of the park. I object to the inclusion of B1c uses which is inappropriate and unnecessary. Research parks based on the early UK technology transfer exemplars of the Cambridge and Oxford need careful monitoring, nurturing and protection to ensure the integrity and quality of the park is maintained and the park continues to be a destination for innovation and enterprise. There is a danger for research parks to be overwhelmed by short sighted development opportunities being taken by park managers provided by standard office activities and administrative functions which in time turn them into standard business parks which can be found anywhere in the country. Their relative low density and attractiveness make them targets for “any other” office user Research parks that lose their way stop being the location of choice for new innovative enterprises. I hope the Surrey Research Park in Guildford remains focussed on a broad spectrum of scientific research including computer science, bio-chemistry, design, space-science, eco-science, health science, software development, laser technology, media-science, artificial intelligence, robotics and super-manufacturing. Monitoring indicators should include new start-ups and new patents created. Facilities should be provided whereby new small businesses can secure premises under subsidised licence fee arrangements with no onerous rent or lease commitments. I support the idea of a variety of sizes of unit including some small units (between 15 – 80 sq m) bearing in mind one workstation is 10 sq m. Consideration should be given to the concept of shared “enterprise hubs” where individuals can take pay as you go workstations in shared spaces similar to touch down business centres similar to the “enterprise village” concept. I object to the policy of any new extension of the research park more than the
The Surrey Research Park currently extends to 65,000 sq m. There is already granted consent to expand to a further 9,000 sq m (14%) This space has been available for 10 years and is still to find a taker. The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis. The ELNA 2015 calculated annual floor space demand is 0.7%. The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period. The necessary growth in floor space over the plan period is therefore 17 years x 0.7 = 12% which is less than the current expansion space of 14%. The research park is developed at a plot ratio of 25%. This could be increased to 50% within the same footprint of the existing park without damage to its amenity. The actual current land use for development in the park is in fact only 12.5% because most buildings are 2-storey.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/14222</th>
<th>Respondent: 15299201 / Samira Abdullah</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy E5</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy E5 Rural Economy

In my opinion this policy should only apply to small-scale development in rural areas which means development of less than 100 sq m (gross) which is in keeping with and the permanence and amenity of the green belt. Use of rural areas for town centre uses without applying the sequential approach is against the principles of localism that require local people to be consulted and heeded, not ignored. Villages need protecting in terms of both design and scale and character. Previous commitments to improved high-speed broadband and mobile phone coverage have now been diluted, despite general support. This disregards the responses from the 2014 public consultation.

The consultation process was not well publicized; many Parish Councils had no idea of this. The emphasis on voluntary efforts and greater community efforts is far removed from reality for this 'solution' was presented for almost every aspect of rural life from managing crime to looking after elderly to education and more besides. Villages by nature are usually small and the percentage of the population who are able to do voluntary work is smaller still. The solution is therefore unworkable. The results of the consultation were not publicized but were instead collated and summarized and bore no resemblance to the submissions I had sight of.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/14092</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy E6</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to policy E6 the leisure and visitor experience. I believe that the importance of a visitor attraction hub could be much better articulated. Guildford has great potential to become a “must see” destination for tourists and visitors. Surrounded by the natural beauty of the Surrey Hills, it is already distinguished as an historic county town. The historic part of the town should be exploited to the full creating a real sense of vibrancy and atmosphere. This should be linked to the attractions of the Museum, the Castle, the Wey and the historic High Street including its views of the Hogs Back.

The economic impact would create big advantages for both the leisure and the niche speciality retail sectors in the town. Given the local and wider catchment of the town Guildford should strive for high quality definition making it a great centre for people to live in and visit. Guildford the historic “Gateway to the Surrey Hills” has far more potential than Guildford just any other stereotypical centre found anywhere around London. Re-branding walks, such as a new “Pilgrims Trail” similar to the Patriots trail in Boston USA with marked yellow footsteps leading from the station to the River and up through the historic heart of the town. There is a need to make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms. There is a need to help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to RHS Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently bypass Guildford to go to Bath, Oxford or Cambridge instead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14223  Respondent: 15299201 / Samira Abdullah  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who
currently bypass Guildford to go to Bath, Oxford or Cambridge instead. THE TOWN CENTRE OPPORTUNITY I do not
consider that the target of 1,172 homes in the town centre takes account of the need and demand for housing or the
opportunities that brownfield sites present for increasing the residential development in the core of the town which will in
itself help to sustain the retail core by increased economic impact. What the town centre needs in terms of urban
regeneration and to attain a thriving night time economy is more residential development. The Town Centre policy needs to
maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units
proposed in by Allies and Morrison for the town centre included in the masterplan 2015. The reality is that the Town
Centre and other areas of brownfield in the borough has the capacity to provide significantly more than this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14208  Respondent: 15299201 / Samira Abdullah  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy H1 Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage
building over the plan period. It fails to set any rules on important issues such as constraints and density, and is not specific
enough to provide a practical framework for planning decisions. The housing mix is based on out-of-date, pre-Brexit
projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated. I support higher
density development but not high-rise development (ie over 10 floors) in the urban area close to transport hubs to facilitate
modal shift e.g. 20 minutes’ walk of Guildford railway station. Student accommodation should provide for 100% of new
students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other
university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s
timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions
dating from 2004 to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building
on its extensive and underused surface car parks). If all students were accommodated in this way, 2,000 homes would be
freed up in town and there would be no need to build on the Hog’s Back. Surrey University has 17 ha of car parks that
could provide all the student accommodation required above it, with parking beneath. Guildford borough already has a
higher proportion of traveller sites than most comparable boroughs. Overprovision is inappropriate given other
constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14073  Respondent: 15299201 / Samira Abdullah  Agent:
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I object to policy H2 Affordable homes. “Affordable” homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that these homes will remain well beyond most people’s means and that starter homes will not become available for local people. In addition, the viability clause (4.2.40) means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. It is a get-out-of-jail-free card for developers that will sacrifice countryside for no local benefit. I question the assumptions that seem to underlie this policy: that people have a right (rather than a legitimate aspiration) to own a home; that they should be encouraged to live locally in enormous debt (contradicting the Government’s policy of encouraging labour mobility and development in poorer regions, where homes are cheaper); that increasing local house-building will reduce overcrowding and congestion (rather than simply suck more people into the borough); and that it will stem the rise in house prices (even though 13,860 new homes will be a drop in the ocean, given that prices are determined by an infinite demand-pull from London, whose population is increasing by 100,000 a year, and by the currently low cost of capital for overseas and other buyers). The weak mechanisms proposed in the plan might influence the market in a more remote part of the UK, but not here. This policy’s version of “affordability” is just a smokescreen for pushing through more development generally. Building more homes in Guildford cannot increase real affordability given the overhang of the London market.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to policy H3 Rural Exception Homes This is a type of Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix”, this can include “market” housing – i.e. normal commercial development which in Guildford usually means expensive executive homes. This policy means building anywhere, and ignoring all historic planning restrictions. The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/14231  Respondent: 15299201 / Samira Abdullah  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy I1 Infrastructure and delivery  Most of the borough’s infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. Yet this plan’s commitment to building housing estates across the Guildford countryside will mean either major infrastructure investment that no-one is prepared to pay for or else a catastrophic and simultaneous collapse in transport, educational, medical, energy, water and communications services. The plan targets greenfield sites – requiring heavy infrastructure investment – in order to generate CIL income necessary to meet an infrastructure shortfall that is already serious. The current draft CIL scale also encourages development on greenfield sites rather than brownfield and will reduce or negate developer's obligation to sell a percentage of homes at 20% below market value. The policy wording says nothing about roads and traffic. The Council’s methodology for assessing infrastructure needs in this area is inadequate, identifying only the tip of an iceberg of existing congestion. Compton Village is already close to tipping point, yet it will see a significant increase in traffic volume, will be completely congested and yet no plans exist to mitigate the problem. The schemes referred to in this policy barely solve existing congestion and are inadequate when development takes place. The full impact on local road networks has not been fully considered. Some proposed development locations would require highway schemes that involve demolishing property and road-widening in residential areas to solve the resultant congestion. The A3 improvements are not guaranteed to take place but they are being used to justify removing large areas from the Green Belt before detailed traffic assessments have taken place. These detailed investigations are being deferred until the planning application stage and will be left to developers to prepare. If a site then proves to be unsustainable its Green Belt protection will have been lost for no reason and unsuitable development will take place by a more insidious process. Compton Village will actually incur increased traffic flow as a consequence of A3 widening according to the study, yet as was pointed out above, no solutions are in place to improve the situation. Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritising greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognising this as a key issue, the plan makes too many assumptions, not least being the verbal promise that development will not take place without infrastructure preceeding it. It is not clear how this will happen and is not in the Plan, as it should be, if it is achievable. The highways network is under stress at peak times in many parts of the borough. Queuing is the daily experience of drivers going to and from work. The local plan recognises the problems in para 2.14. Much of the road network is single-carriageway, and junctions act as constraints. The key evidence on future traffic conditions is provided in the Strategic Highway Assessment Report (SHAR) which summarises the results of the tests carried out by Surrey County Council at the request of GBC. Five scenarios were examined using SCC’s strategic traffic model. Scenario 1 contains all developments and planning permissions from 2009 to date. As such it corresponds to today’s circumstances, and describes the current unsatisfactory traffic conditions in peak periods. Scenario 5 represents the position at the end of the plan period, including all development and highways schemes in the local plan. The results of the analysis show that there will be widespread congestion in the morning peak hour across the network. The key strategic routes, the A3 through Guildford NE bound, and the M25 between Junctions 10 and 11, are shown to be at or over capacity. The summary network statistics presented in the SHAR, while useful, require some interpretation because the analysis of vehicle-hours is derived from link speeds only, and does not reflect junction delays and queues. The tables that show the ratio of flow to capacity and level of service are especially helpful to gaining an understanding of the conditions on the network in the forecast. Where the forecast traffic volume is above or close to capacity, flow becomes unstable and there is congestion. The SHA results provide evidence that, in 2031, congestion will be worse than it is today on much of the network. It is the case that the traffic modelling does not take into account the potential for increased use of other modes, but the trip rates used for developments already have built in the typical level of use of other modes, and services will be required to meet that need. It is also the case that the model does not allow for park and ride, which would improve matters in the town centre, as discussed below. In order to
gain an insight into conditions across the network, it is necessary to combine information from several tables in the SHAR. Table 4.5 shows that the M25 and A3 will be at capacity in Scenario 5. The other roads that will have poor levels of service include those in Table 4.5 but also those in 4.12 (except the A3) and those in Tables 4.3 and 4.4 with levels of service E and F that will not be given some relief by improvement of the A3 in Scenario 5. Paras 4.10.3, 4 and 5 point out that there will be increased congestion. Given that the starting point is unsatisfactory, there can be no expectation that the schemes in the Infrastructure Development Plan will provide an overall improvement. There will be some local benefits, such as the Ash rail bridge for example, but in general conditions will be as bad and in many places, such as Compton Village, worse. So the statement in the SHAR para 4.2.5 that ‘the combined mitigation as reflected in Scenario5..indicates that at the strategic level it accommodates the additional PSLP demand’ needs qualifying – ‘at the cost of a lot of queuing’ and makes no mention of the impact this will have on pollution, which is already a known problem at the A3 end of Compton. The cumulative effect of the additional traffic generated by the developments in the local plan will be to increase congestion, even with the proposed highway schemes in place. More detailed analysis of the junctions and queuing is required. So we question the conclusion that the developments would have “an acceptable impact on the capacity of the highway networks in terms of the policy test set in paragraph 32 of NPPF”. Appendix 3 of the Transport Topic Paper shows the phasing of housing development and transport infrastructure. The major scheme being considered for the A3 between the A31 and the A320 is scheduled for delivery in the period 2023/24 to 2027/28. The strategic developments at Blackwell Farm and Gosden Hill Farm are shown as being phased in from 2021/22 onwards. The Garlick’s Arch development is shown as starting in 2019/20. Therefore, there will be a period in which the existing A3 has to cope with the additional demand arising from those developments before extra capacity is provided. The following comments regarding the strategic sites are taken from the SHAR: Blackwell Farm – there will be congestion at the A31 junction, and the problems at the Tesco junction, and the Egerton road /Gill Avenue junction (para 4.9.5). Traffic is likely to access the Surrey research park and the RSCH through the development (para 4.7.3) Gosden Hill Farm – there will be an increase in traffic through Burpham. There will be pressure on the A3100/B2234 roundabout (paras 4.7.6, 4.7.7 and 4.7.8). Wisley – traffic will increase on minor roads to gain access to the A3 (N and S bound) and other routes (para 4.7.11). The development will add more traffic to the A3. The Burnt Common slips help alleviate the traffic through Ripley according to the model, but queuing on the A3 could mean this does not happen (para 4.7.14). Normanby/ Flexford – the report has little to say about the impact of this large development. The increase in flow on Westwood Lane is noted (para 4.5.7). Tables 4.10 and 4.11 show junction delay reducing at the Westwood Land, B3000 junction, but an increasing at the Puttenham Hill/Millbrook junction. Ash – development in Ash is not specifically addressed, but there are major increases in traffic on a number of roads. The new rail bridge will bring relief (but traffic will move to the next junction). Slyfield – there are no remark relating to SARPs, and as there are no additional trips shown in and out of the Slyfield residential zone in Tables 3.3 and 3.4, it is possible that this development has been omitted. There is a significant increase in trips to and from the Slyfield industrial zone, which will impact on the A320 and Clay Lane. Town Centre – the report has very little to say about the town centre. It is evident that the model is forecasting severe congestion on the approaches to the town centre, such as the A281, the A31 Farnham Road, and Woodbridge Road for example. No mitigation measures are planned. And in the Transport Strategy, GBC states that the intention is to adopt Allies & Morrison’s Scenario 2 which would have the effect of significantly reducing the capacity of the town centre road system. The implications have not been examined, but traffic using the A281 from Waverley, for example, would be affected.

The B3000 will be severely affected by development schemes and will not benefit from road improvements. It is essential that the impact of all change to road networks are looked at in conjunction with one another for any survey to be meaningful. The local plan does not state an objective for congestion. The two strategic objectives that are included for infrastructure refer to supporting sustainable development and delivering a balanced system. However, in para 2.15 there is an aspiration expressed about opportunities to improve the performance of the road networks through transport infrastructure and service improvements, which taken with the previous paragraph includes reducing congestion. The evidence so far shows that this will not happen. The mitigation proposed is not sufficient to overcome the problems that will be caused by the level of growth in the local plan. Congestion will worsen. The network will lack resilience and be vulnerable to disruption due to incidents. Minor roads will have to cope with a lot more traffic, for which they are unsuitable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14232  Respondent: 15299201 / Samira Abdullah  Agent: 15299201 / Samira Abdullah
I object to policy i2 Supporting the Department of Transport’s “Road Investment Strategy” This policy is too vague and unrealistically optimistic. Decisions by Highways England on improving the strategic road network (the M25 and A3) are still years off. The Council have suggested a very expensive tunnel under Guildford, but there is no evidence to show that this is a realistic option. Even if Highways England accepted this (which is highly unlikely in the post-Brexit public spending climate) it would not be built until the end of the plan period at the earliest. Other, less expensive A3 improvements, and changes to the Junction 10/Heathrow stretch of the M25, will also take years to agree and complete. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is foolhardy. Surrey is the most congested county in England, with 683 people per square kilometre, compared with an English average of 413. This policy will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone). This is a major development constraint that should have been applied to the OAN to constrain the housing target.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to policy I3 Sustainable transport for new developments This is another aspirational policy, not grounded in the practical realities of daily life. It consists of a standard, box-ticking list of local government measures unrelated to the specifics of the plan. Like infrastructure, transport appears to be an afterthought; the policy fails in its essential job of guiding planning decisions, since it assumes development of any kind can be supported by sustainable transport. The sustainability of the dormitory settlements which the Council want built across the countryside depends on a general “modal shift” from private car use to walking, cycling and public transport. This is unrealistic. The proposed sites are often miles away from the nearest railway station. Bus services even in the largest villages are almost non-existent – just one bus to and from Guildford each day in the Horsleys and none at weekends. Since bus services depend on profitability, they cannot be expanded and the Council are not proposing to subsidise new ones. Rural buses are too slow anyway for busy people. Most rural roads in the borough are narrow, winding, hilly, potholed, muddy and unlit. Many flood badly and have no footpaths. The desired modal shift would require a comprehensive co-ordination of bus and train timetables with services every few minutes, seven days a week, to stops within walking distance of every home in the borough. This kind of integrated public transport system has been achieved in Switzerland, for instance, but only at huge public cost and thanks to a political consensus supporting state ownership of trains, buses and the post office, which delivers rural passengers as well as mail. There is absolutely no chance of this in the UK. The vast majority of the borough’s residents are not, in practice, able to cycle. This includes children, the elderly, commuters who have to look smart, the infirm, the unfit and people carrying goods or shopping of any kind. Dependence on walking and cycling discriminates against these groups,
which include some of the most vulnerable members of the community. It is socially unjust. One in two working people in Guildford commute for up to 3 hours a day. They will not leave their cars for even part of their journey if it means longer travel times. Park-and-rides are a welcome part of the transport mix but are too slow for commuters and others on a tight schedule. For an adult couple going shopping it is still cheaper to park in town. I like the idea of water buses but have concerns over the reality. The Wey is narrow and, with a river speed limit of 4mph, boats are too slow for anything but recreation. Except on the tideway, not even the Thames has such services. The addition of two new stations appears attractive but will slow down train journeys, which are already slower than at any time since the 1930s. Knock-on effects on localities where the new stations are built have not been worked out or presented. Ie. Cost of housing will increase.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14104  Respondent: 15299201 / Samira Abdullah  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy I4 green and blue infrastructure. This policy is a box-ticking exercise with no teeth to it. It sits oddly with the plan’s onslaught on the Green Belt. The plan to build on large areas of countryside and to inset villages will cancel out any benefits from extending the principle of enhancing biodiversity beyond Biodiversity Opportunity Areas. There is no mention of the value of wildlife gardening to biodiversity or the important role that larger gardens play in a village setting.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14234  Respondent: 15299201 / Samira Abdullah  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy I4 green and blue infrastructure. This policy is a box-ticking exercise with no teeth to it. It sits oddly with the plan’s onslaught on the Green Belt. The plan to build on large areas of countryside and to inset villages will cancel out any benefits from extending the principle of enhancing biodiversity beyond Biodiversity Opportunity Areas. There is no mention of the value of wildlife gardening to biodiversity or the important role that larger gardens play in a village setting.
I object to the omission of a policy for the River Wey which was included in the previous local plan. The existing policy G11 from 2003 Local Plan should be included so that development within the River Wey corridor will only be permitted provided that: It protects or improves the special character of the River Wey and the Guildford and Godalming Navigations, in particular their visual, setting, amenities, ecological value, architectural and historic interest; The special character of the landscape and townscape in the corridor is protected or improved; Views both within and from the corridor which contribute to this special character are protected or improved; Where appropriate, public access is provided to and along the River and the Navigations. The Nature Conservation value of the site is protected or improved.

GREEN BELT SITES
I object to ALL Green Belt sites allocated for development in the local plan.

13 All Green Belt sites should be removed from the plan until “exceptional circumstances” for development are proven, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14211  Respondent: 15299201 / Samira Abdullah  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy P1 Surrey Hills Area of Outstanding National Beauty. This policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. The latter welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated. Much of my concern stems from the loose wording of the Policy, which in some places renders the policy ineffective, for example: "All proposals will be considered against whether they..." "All development proposals within and adjacent to the AONB will be expected to conserve or enhance its special qualities" Terms such as "considered" and "expected" are not strong enough in prohibiting development proposals that do not conserve and enhance the AONB, and it is likely that developers will be able to use this loose wording to their advantage. Of particular concern is the paragraph 3, which begins: "Whilst the AONB designation does not preclude specific types of development in the Surrey Hills and proposals will be assessed on their individual merits..." This whole opening clause is unnecessary and almost invites development proposals. I believe that it should be deleted, and the sentence should therefore begin: "There is a presumption against major development in the AONB in accordance with NPPF." In addition to the weakness of the language, I am also concerned that the AONB criteria listed in the policy are not the most important ones in determining whether a planning application should be approved. Aside from the one outlined in the first bullet point (which relates to the AONB setting) none of these criteria is concerned with the key characteristics of AONB, i.e. landscape character, scenic beauty, important views, tranquility etc. Whether or not a development supports the rural economy or provides public access are of far less national importance than preserving the quality of the landscape itself. I believe that the AONB Policy in the Draft Plan 2014 provided greater protection to the AONB, and would like to see the following sentences reinserted: "The national significance the AONB will be afforded the highest level of protection and only proposals which can be sensitively amalgamated into the area and which complement and enhance the character of the AONB will be considered" "Proposals within the AGLV which would have a negative impact upon views into and out of the AONB and which do not respect the..."
setting, will not be acceptable” In accordance with the most up to date Minerals and Waste Plan, safeguarding of applicable land within the AONB and/or AGLV may be necessary and deemed appropriate Finally, I would like to see a clause which gives protection to the candidate areas for AONB status in the forthcoming Surrey Hills AONB Boundary Review. This should include Blackwell Farm which was recently reviewed by an Independent consultant and deemed worthy of inclusion as a candidate. I consider that all land that has been assessed as meeting the latest Natural England criteria for AONBs should be subject to the same level of protection as an AONB, not just land that has been designated AGLV.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14212  Respondent: 15299201 / Samira Abdullah  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy P2 green belt This policy states, “the general extent of the Green Belt has been retained.” This is a misleading statement. The policy wording is weak in support of the Metropolitan Green Belt even though the latter forms 89% of the borough and should be the cornerstone of all local planning policy. It is precious beyond the short-term demands of the present Government’s policy or a 15-year local plan. As noted under Policy S1 above, it is a solemn legacy to future generations – an asset and amenity that belongs as much to Londoners and the whole nation as to the people who live in it. Once gone it is gone forever. It is not the Council’s to give away. Policy P2 completely fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it has been around for a long time and it needs to be permanently protected. It was actually established in a local act of parliament in Guildford under the London Home Counties (Green Belt) Act 1938 and subsequently in the 1944 Greater London Plan to contain the outward sprawl of London. The boundaries of the Green Belt through Guildford Borough were later defined in the 1987 Local Plan, forming part of a 19-24km concentric belt around London. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land. The principles of the Green Belt designation were outlined within Planning Policy Guidance 2: Green Belts (PPG2) and are found within the National Planning Policy Framework (NPPF). The Metropolitan Green Belt is an exemplar of good planning and the envy of planners throughout the world. Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. Building on it involves high opportunity costs, including an irreversible loss of:

1. Agricultural production
2. Rural leisure and tourism amenities
3. Water catchment
4. Flood control
5. Biodiversity
6. Natural heritage
7. A carbon sink for air pollution
8. Room for public facilities such as parks and burial grounds
9. Profitable film locations (e.g. Shere)
10. Future economic potential such as mineral extraction (even fracking)
11. Natural beauty, landmarks, open space, rural views and sight lines
12. Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF)

As a matter of law and national and local policy, these assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultations. It is quite incorrect to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold. I object to the “insetting” of 14 villages from the Green Belt. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost hell bent on self-defeat. I believe this policy is based on a flawed Green Belt and Countryside Study that, according to one Conservative Councillor, was irregularly commissioned by Council officers without the authority of Councillors. To “inset” two thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, although they would quickly destroy them if the proposed “insetting” and boundary extensions go ahead.

I object to the removal of over 400 hectares of Green Belt land in and around Blackwell Farm to facilitate further development of Surrey Research Park and for 1800 homes. Over 60 hectares were removed from Green Belt 12 years ago for the same developer (Surrey University) who has yet to fulfill their planning obligations. This valuable land has been squandered with over 17 acres of surface car parking and as one of the key features of Green Belt is its ‘permanence’ this second request for yet more Green Belt land to be released in such a short space of time, with all the outstanding issues that remain makes this all the more objectionable.

Furthermore I object on grounds of the impact this development will have in terms of congestion on our highways, these issues have been highlighted under ‘infrastructure’.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to policy P3 Countryside (i.e. beyond the Green Belt) This is more protective – as a policy – than the proposals for the AONB and the Green Belt, so is anomalous. I am not in favour of building on this area, since urban, brownfield areas are sufficient to meet all reasonable housing targets. There is no need to build on any green fields if brownfield, previously developed land is used efficiently (without garden-grabbing). This policy refers to the countryside near Ash and Tongham (see paragraph 4.3.28). This area does not justify stronger policy protection than any other part of the borough. The fact that the current and previous Council Leaders represent it should not give it preferential status: “we will seek to limit any development in the countryside unless it can be demonstrated that it is necessary in that location”. Green Belt and AONB areas should by definition have higher levels of protection than non-Green Belt areas. It should also be noted that Ash and Tongham lie beyond Guildford far away from London and therefore make no contribution to controlling Metropolitan urban sprawl, that is presumably why Ash and Tongham are not in the Green Belt already. This policy, however, attaches higher priority to preventing the “coalescence between the Ash and Tongham urban area and Aldershot” than it does to the primary purpose of the Metropolitan Green Belt, which is to stop London sprawl. I agree to the prevention of coalescence but this should apply to all villages including East and West Horsley and Flexford and Normandy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to policy P4 Flood risk and water source protection zones Urban development on existing hardstanding would not create additional flood risk, especially where there is scope for improved flood resistance measures to be included in the design. Sites such as Woodbridge Meadows Industrial Estate and the Arriva bus depot, on the River Wey bank, are potential high-value brownfield sites that would not be available for housing if this policy is implemented. It is not the footprint of existing buildings that should limit future development, but the extent of existing hardstanding. Tarmac and concrete do not act as functional floodplain, and some land with hard standing close to the river, within the town centre and within easy walking distance of the railway station, provides an excellent opportunity for real urban regeneration that could protect the surrounding countryside.

I strongly believe that this policy should not be used as a convenient excuse not to build on the extensive area of brownfield sites between the station and Ladymead. Any new development in this area could easily be built on stilts with flood resistant ground floor parking in areas that are identified as high flood risk. This area has been built over successfully over the last 50 years. We do not need to stop now.

I do not support building directly on (as opposed to over) flood plain as the land is effectively a soak away, but intelligent architecture has been dealing with this problem for many decades in other parts of the UK and the globe.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to policy P5 Thames Basin Heath Special Protection Areas. This policy is not robust enough. The mitigation (cash compensation) offered for development in the special protection area is so small as to be meaningless. SANG (Suitable Alternative Natural Greenspace) is not beneficial since the sites identified or targeted are already green space. This is just using agricultural or wooded land as recreation land in order to justify building on other green spaces nearby. There is no actual increase in open space or environmental protection; instead, it is a ploy designed to permit building on otherwise protected areas. SANG – in part used to prevent dogs and cats attacking nesting birds – must also ensure that it is not using land which is adjacent to the Special Protection Areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14206  Respondent: 15299201 / Samira Abdullah  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

I object to policy S1 as stated and the presumption in favour of sustainable development. The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” Policy S1 ought to set a clear framework. No definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts. The promise “to secure development that secures the economic, social and environmental conditions in the area” omits to recognise that economic growth, social justice and environmental protection often conflict. It does not say how each element is to be weighted or conflicts resolved. As a practical guide to the tough choices Councillors will face, it is without value. Under this policy, any development will qualify as “sustainable”, thereby failing to apply the NPPF’s most important guideline. The most gaping hole in Policy S1 is the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. It is the envy of the world. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The plan’s contempt for Green Belt constraints is amply demonstrated in later policies. The commitment to approve planning applications “wherever possible” and “without delay” reveals this draft plan’s pro-development bias. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all. This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14071  Respondent: 15299201 / Samira Abdullah  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy S2 the Borough Wide Strategy and the commitment to build 13,860 homes based on the Strategic Housing Market Assessment (SHMA) 2015 prepared by GL Hearn. The OAN “objectively assessed need” figure in the SHMA of 693 homes a year is far too high! I am very surprised and concerned that GBC have adopted the OAN of 13,860 homes as the housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance. The scale of the housing number proposed, inevitably increases the onus for it to be seen to be sound.

A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole. Other local planning authorities appear to take a more balanced view in their approach to planning. The Woking Core Strategy 2012 applies a constraint of 50% from the 594 new homes identified in their own SHMA. “It should be noted that local evidence (Strategic Housing Market Assessment - SHMA) highlights a need for an additional 499 new affordable homes every year in the Borough and a total of 594 new homes every year when taking into account demand. Given the level of environmental constraints present in the Borough, it is considered that the provision of an average of 292 dwellings per annum represents a reasonable level of housing growth for Woking and is deliverable.” Historically GBC have correctly applied constraints on housing numbers to protect the Green Belt. The Surrey Structure Plan 1994 advocated a general slowing down in the rates of development “because of the environmental constraints which exist in the County, including Green Belt”.

This slowing down was reflected in the requirement that Guildford Borough should accommodate a net increase of 3,800 dwellings between 1991 and 2006. This was a lower rate of development than in previous years.

It is interesting to note that the Structure Plan at that time expected sufficient land to arise within the urban areas to accommodate this requirement. However it would appear that today GBC have effectively ignored the real potential of the urban area to provide for housing. At the same time GBC have adopted a radically different approach to the policy of the Council over the last 20/30 years and are now ignoring government policy in relation to the Green Belt. A detailed and comprehensive professional review of the SHMA dated June 2016 by NMSS an independent expert firm dealing with housing and demographics procured by Guildford Residents Association (GRA) has concluded that the OAN figure should be revised down from 693 homes per annum to 510 homes per annum. The 41 page report by NMSS which can be found on the GRA website entitled “A Review of the West Surrey SHMA as it relates to the Objectively Assessed Housing Needs of Guildford”. It was a real community effort. It was paid for by over separate 20 Guildford Residents Associations and Local Parish Councils none of whom were convinced that the SHMA report procured and presented by GBC was accurate or transparent or accessible in a meaningful way. So they clubbed together and collected contributions from many hundreds of Guildford residents to try to find out the truth of the housing need figure presented in the Local Plan. The NMSS report includes detailed analysis and financial modelling and was prepared by Neil McDonald. He is an independent adviser and commentator on housing demographics. He works with local authorities and others on the estimation of housing need and related issues. He was a civil servant and policy adviser to Ministers for over 30 years, the last 10 advising on housing and planning issues within the Department of Communities and Local Government. His 7 years as a Director at DCLG included a posting as Director, Planning Policy and a period as Chief Executive of the National Housing and Planning Advice Unit. NMSS found that the SHMA used in the Local Plan incorrectly adds extra homes to its basic demographic projection to allow for improving affordability of housing, increased student numbers and economic growth.

The report found that none of these additions were justified based on the evidence presented within the SHMA. The report concluded amongst other matters that:

The affordability of housing in Guildford is no worse than in other Surrey districts and boosting supply beyond the demographic OAN would not result in a noticeable improvement in affordability but simply in more people moving to the area.
There are reasons for believing that the SHMA’s estimate of the number of homes needed for students may be too high and that an adequate provision for students is already included in the demographic OAN. The report advises that the Council should commission a separate student housing need figure for Guildford given the distorting effect of students on our overall OAN. It envisages that, once this exercise is undertaken, improved accuracy means the overall OAN would be likely to reduce still further.

The SHMA seeks to estimate the number of homes needed to support employment growth using employment rate assumptions that are inconsistent with the employment forecasts. This produces misleading results. An analysis of the Cambridge Econometrics and Oxford Economics forecasts using employment or economic activity rate assumptions consistent with the forecasts suggests that in neither case is there a need to provide more housing than suggested by the demographic analysis. Indeed, in both cases a smaller population growth (and hence fewer homes) could support the jobs growth that is forecast. A further independent report was procured in 2016 by the Campaign for the Protection of Rural England CPRE from Richard Bate of Green Balance, an independent consultancy with expertise in demographic and housing matters to carry out a review of the GL Hearn SHMA.

The report by Green Balance runs to 37 pages and its findings are that the OAN for homes in Guildford should be reduced from 693 per annum to 481 because:

1. the vacancy rate figures should be taken from local government annual records rather than from the 2011 Census. This would reduce vacancy rates to 2.9% in Guildford.
2. there should be no increase for affordability above basic demographic change.
3. there should be no increase for Student housing and it was considered unrealistic that the University should be allowed to exert such substantial pressure on the domestic housing market.
4. the use of employment-led forecasts should be abandoned using purely household projections instead which are more reliable as a form of prediction. Two completely independent expert reports are surprisingly consistent in their findings. In broad terms a figure of approximately 500 homes per annum would appear to be a correct estimate of OAN for Guildford. However, this is before constraints are applied to arrive at an acceptable housing target. The SHMA is based on pre-Brexit projections for economic and population growth, including migration. These now need to be revised downwards. It is unacceptable that demographic and economic model assumptions have been withheld by GBC and cannot be checked making the process unaccountable.

The figure of 13,860 new homes is unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by commercial sub-contractor used in preparing the SHMA. Both the National Planning Policy Framework and National Planning Policy Guidance provide a clear policy direction that the overall housing target should be reduced by a variety of constraints to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors. I have corrected this omission below. Infrastructure policies should be planned at the same time as Local Plans but in this case they have effectively been left out and are not sufficiently developed. The Framework also makes clear that, once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt.

THE NEED TO APPLY CONSTRAINTS

Ministerial guidance in relation to building on the Green Belt is clear:

1. “the single issue of unmet need - is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development in the Green Belt” - Nick Boles to Sir Paul Beresford MP 7th February 2014.

2. “we were always very clear that we would maintain key protections for the countryside, and, in particular, for the Green Belt. The Framework makes it clear that a Green Belt boundary may be altered only in exceptional circumstances and
reiterates the importance and permanence of the Green Belt” – Nick Boles to Sir Michael Pitt, Planning Inspectorate 3rd March 2014.

3. “Planning Guidance, updated in March 2014, also states that unmet housing need is unlikely to outweigh the harm to the Green Belt to constitute the very special circumstances justifying inappropriate development within the Green Belt” – Nick Boles to Sir Paul Beresford MP 18th June 2014

70% of the sites put forward in the Local Plan are in the Green Belt which flies in the face of current government planning policy. The National Planning Policy Framework (NPPF), National Planning Policy Guidance and case law make it clear that Green Belt is an absolute constraint on housing supply. Exceptional circumstances need to be shown to adjust boundaries. Other constraints under the NPPF include assessments of sustainability, strategic flood risk assessment, physical constraints on land use and infrastructure constraints (this can include road congestion, schools, drains, power supply and medical requirements). Constraints should be applied to the Objectively Assessed Housing Need (OAN). However this itself is overstated and should be reduced from 693 per annum to 500. In view of the comments above it would appear logical to apply CONTRAINTS in line with government policy to a corrected OAN. of approximately 50% to account for the fact that 89% of the borough is in the permanent Green Belt and development is not supported by adequate major infrastructure. This reduction is in line with the constraints percentage of 50% applied by Woking Borough Council. This would result in a more acceptable and practically achievable HOUSING TARGET of 250 homes per annum which over a 20-year period would be 5,000 homes. All of these homes could be built in the existing urban brownfield areas of the borough and would in part satisfy the 20,000 objections made by residents to the 2014 draft plan and also relieve the additional problems of inadequate infrastructure. It would also mean that there is currently 8.5 years supply of housing (2131/250) which is made up of existing permissions granted (1,518) and completions made (613) during 2013/2015. (Monitoring Report by GBC 2015) The Brexit vote may have strengthened government policy further. Theresa May, the new prime minister, announced on 11 July that she is personally committed to protecting the Green Belt once she takes office. Whilst I have many significant objections to the GBC Local Plan I applaud the policy statement by GBC in their Monitoring Report, “We will continue to monitor the use of previously developed land, and continue to identify as many opportunities as possible for redevelopment of previously developed land.” I believe it will be to the benefit of all residents if GBC can apply themselves vigorously to this endeavour in order to protect the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1646  Respondent: 15299201 / Samira Abdullah  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

Key parts of the evidence are still missing, flawed or based on withheld assumptions. The Strategic Housing Market Assessment overstates need, the Green Belt and Countryside Study uses a flawed approach, and the Transport Assessment is too late and incomplete to be relied upon to inform the Plan.

The Plan excludes the Town Centre Master Plan, which plays a pivotal role and fails to address the results of infrastructure difficulties, or use these and Greenbelt to constrain the level of development.

The Employment Land Needs Assessment

I object
This document omits many important points that are to be addressed at a future stage. The information is, however, very relevant and necessary and without it the document is weak on evidence. The overview given does not assess the capacity of existing supply to accommodate future growth. The paper acknowledges that almost 9% of commercial premises are empty and this somewhat flies in the face of arguments to vastly increase the volume until the reasons are understood. Around 30% of businesses are considering leaving Guildford (congestion being cited as a reason). There are also issues with planning permissions being granted to convert office space to residential, whilst at the same time it is argued that more offices are needed? The contradictions appear to indicate that policies related to this need firming up and that the evidence is incomplete.

I disagree with 40% of land in the town centre being given over to retail as there is no evidence that Guildford will 'buck the national trend' in terms of declining high-street sales, as has been suggested by Cllr Furniss. Guildford urban area ranks no 1 in terms of being the most sustainable location in the borough and, as housing is a priority, there should be more than 1,172 residences in the town centre.

I object to Policy E4 (expansion of the Surrey Research Park into the Blackwell Farm) The existing Research Park has been built at a very low density (25% plot ratio), which is very low for an urban extension. The majority of existing buildings are 2 storeys giving a developed floor space plot ratio of only 12.5%.

The existing Research Park has acres of surface car parking, which provides it with the opportunity to markedly increase its density without infringing any Green Belt land nearby. Any density increase would be cost effective for the use of all existing infrastructure and would also have the potential to match the existing density of the neighbouring academic buildings on the university campus at Manor Park, which is five times higher.

Together with the existing expansion of 14% through existing consents and the opportunity to increase its density, the Research Park has ample capacity to expand to embrace new demand for B1b uses linked to the university, without utilising additional land.

Infrastructure

I object

The infrastructure schedule makes reference to 'improvements' without saying what they are. It includes a junction at the Guildford end of the A31, and another junction at Tongham. No evidence or traffic modelling data is available to demonstrate whether these 'improvements' will indeed improve anything at all given the additional traffic that will be generated by the new developments included in the plan. The Highways Assessment indicates that, even with these 'improvements', the level of congestion on the A3, A31, the B3000 and A25 will leave these roads over capacity and congested.

Constraints should be applied to the housing need/number as a full application of the overinflated number will have a severe detrimental impact on our road network. Smaller housing estates may be more difficult financially, but they would have less impact on infrastructure and could be considered where infrastructure already exists. The borough has many acres of surface car parking which, if replaced by multi-storey versions, and combined with current Brownfield sites, would free up enough land to build housing where it is wanted and needed and not on valuable Green Belt. There would be no need to build high-rise style development in Guildford town, which we don't support, but we do believe that buildings of 6-10 storeys (with underground parking) would be in keeping in some urban areas (where they don't impinge on important vistas). [Some existing buildings already reach 5-7 levels in height].

The traffic maps omit the area south of Guildford borough completely and the lack of detail about impact on the B3000, a strategic route, is highly questionable, particularly as there are no solutions in place to deal with the impact. I am particularly concerned that, after the main highways routes of M25, A25, and the A320, the B3000 will incur the greatest increase in flow as this road is already close to capacity, with tailbacks at peak times. The road is no longer fit for purpose and modelling shows that developments planned, and the introduction of a new westerly route through Blackwell Farm, will severely worsen the situation, whether major work takes place on the A3, or not.

The Highway Assessment

I OBJECT
The strategic highway assessment requires a great deal more work and hence I OBJECT to the inclusion of this as evidence.

The B3000 runs through Compton, a small village with many listed buildings, most of which are very close to the road. The road already carries in excess of 5 million vehicles a year with average flow rates exceeding most A roads. It is the only settlement area in the borough where pollution levels exceed EU regulations and it is close to capacity now, with tailbacks at peak times, which add to the pollution problem. [see legal section]

The study is highly misleading. It refers to a figure of zero additional traffic from scenario 3, which includes the traffic from the strategic sites, one of which is partly in Compton. The assessment does not make it clear that the modelling is extremely limited and only includes impact on developments within the immediate area. Blackwell Farm is excluded from Area 107 (part of Compton) as false boundaries have been set. I believe that the impact from the strategic sites will be far-reaching and will most certainly impact Compton and beyond. Each village needs to be able to see the impact that development will have.

The Highways Assessment concentrates on peak time traffic only and gives no indication of overall volume increases or traffic type using specific routes outside peak hours. Understanding of the overall increase is important, as there is a bridge on the B3000 between Artington and Compton, which has a width restriction and may also require a weight restriction as it needs replacing within the next 2 years and no funding has been set aside for this. Instead Network Rail, SCC, GBC and Waverley BC continue to battle over responsibility for, and scope of, the project.

It appears that traffic data has been collected at different times of the year and over varying time scales in order to provide averages. This method of data collection can underestimate measurements by at least 30%.

Furthermore, I have been told that the person responsible for ratifying traffic data at Surrey County Council (SCC) has been off sick for over a year and that, whilst the daily data boxes continue to collect data, that data has not been collected or analysed for 2015. The data put forward for Compton's B3000 was based on a 3-week period in January and, as this was not representative, we understand it was removed. That said, the year-on-year data is for different periods and different times, varying from a few weeks in winter to longer periods over many months. I would like a more robust approach to traffic data collation.

The cumulative effect of the additional traffic generated by the developments in the proposed submission Local Plan will be to increase congestion, even with the proposed highway improvement schemes in place. More detailed analysis of the junctions and queuing is required. We question the conclusion that the developments would have an acceptable impact on the capacity of the highway networks in terms of the policy test set in paragraph 32 of NPPF’. We do not believe that the impact on the B3000 will be acceptable, as it is already operating beyond capacity, and this situation will be made much worse following the mitigation proposed for the A3.

The Highways Assessment is limited to 30 results. Roads have been omitted from the report and it is unclear whether findings for the B3000 (also referred to as The Street B3000) are in fact from the Street or the roundabout from which there is a feeder road to Godalming via Priorsfield Road.

The table comparing scenarios and the impact on traffic is difficult to decipher. Scenario 1 includes current planning permissions plus Waverley's strategic sites. This shows an increase of just 9 vehicles per hour at peak times on the B3000. The next scenario 2 is the same, but includes GBC's strategic sites. Given that there is a strategic site in Compton of 1,800 homes and another of 1,000 at Normandy, the expectation would be for the volume to be not only higher, but considerably higher. The result is however, ZERO. We understand that this is because the impact measured is only from the immediate area and, as Blackwell Farm has been removed from the village for modelling terms, this does not give a realistic result. The omission of the Town Centre Master Plan and its impact on the roads further diminishes the integrity of this Highways Assessment.

Even without the full impact being understood, it is clear from the scale of development on the west of Guildford (1,800 homes at Blackwell Farm, 1,000 homes at Normandy, 1,300 homes at Ash, 3,800 homes in the Aldershot urban area, 1,200 homes at Borden) that the increase in traffic on the B3000 and other main routes would be severe.

The Highways Assessment shows that as a result of the proposals put forward in this draft of the Local Plan the B3000 will suffer the highest increase in flow rates at peak times (after the M25, A320 and A25. It also reveals that traffic flows would
increase if the A3 was widened, as the A3 would then attract more traffic via the B3000. Despite this, there are no solutions planned to mitigate the situation and we are therefore strongly objecting to the level of development and in particular strategic development at Blackwell Farm as outlined in the Local Plan.

The proposal to introduce a new route to Guildford town centre from the west via Blackwell Farm has been ill thought out. The volume of traffic that will use this new ‘rat run’ through the new development and the university campus/business park, has been underestimated. There will be problems for traffic wishing to exit the new development in both directions during peak hours - traffic is frequently queuing for miles along the A31, and the Tesco roundabout is one of the worst bottlenecks in Guildford. The knock-on effect on the Egerton Road/Gill Avenue junction would impede emergency vehicles getting to and from the hospital.

The 4-way junction on the A31 has no detail at all and the concern is that permission in principle will be given to the site in the hope that these problems are surmountable. If they are insurmountable, which I believe they are, then enormous amounts of Green Belt land within the setting of the Surrey Hills AONB will have been sacrificed for nothing. The 4-way junction, if it goes ahead, is likely to be huge and, due to its elevated position, will cause significant harm to the AONB in terms of landscape and light pollution.

The Highways Assessment has many limitations, not least being the absence of the Town Centre Master Plan, which includes potential road closure and re-routing. Compton is likely to be very much affected by any reduction in road capacity in the town centre and it is important that we are presented with the whole the picture.

The Assessment acknowledges that not all impacts of proposed Blackwell Farm development have been modelled and that, due to the emphasis on the A31 and the A3, not all roads were included.

The report concludes that the improvements to the A3 are necessary to maintain adequate flow rates on the strategic network. Further work is needed to determine what impact any widening or junction improvements will have on local roads, and what will be done to mitigate against the increased flows through Compton, particularly given that a section of the B3000 though the Village is anticipated to become an Air Quality Management Area. GBC has resisted requests by members of the PC to have the northern end of The Street made an AQMA, but readings of nitrous oxide in this area are well above EU legal limits.

There is little information about the tunnel but the map indicates that one access / egress point will be in Compton near the A3, although no land has been safeguarded for this purpose. This is likely to have the same impact as the improvements to the A3, i.e. increased traffic (and pollution) through Compton.

The Spatial Hierarchy

The spatial hierarchy, which outlines Guildford's preferred strategy, does not match up with the proposed plan. The hierarchy places Brownfield sites (including those on Green Belt) as a priority, but the Plan has 66% of development on Greenbelt and only 34% on Brownfield. The hierarchy lists Guildford town and urban areas as a priority followed by inset villages and identified Green Belt villages. A relatively small percentage of housing is allocated for Guildford town (the most sustainable location) and Green Belt areas, such as Blackwell Farm, with high sensitivity have been classified as within the 'Guildford urban area' when they are in fact in the open countryside. We are told that only 1.6% of the 89% Green Belt has been earmarked for removal and that the 6% removed via insetting doesn't count as these villages are already developed. If this is the case, why list them in 4.1.16 of policy s2 - Spatial Strategy?

4.18 The preferred options cannot accommodate all that Guildford ‘needs’. This is untrue. Two specialist consultants have independently critiqued the OAN and both question the level of uplift and the use of ONS data without full correction for changes and anomalies. They refer to ‘double accounting’ as the uplift is introduced at several stages and the assumptions that result in the final OAN are not explained. See comments on Strategic Housing Market Assessment (SHMA).

Strategic Housing Market Assessment (SHMA)

I Object

The “objectively assessed need” figure of 693 homes a year is too high.
A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the SHMA method should be changed to consider student housing need separately due to the distorting effects of students on the figures.

The current SHMA inflates the proposed housing figure due to:

- failure to correct for errors in the historical data for international migration flows,
- issues with the way it considers students and affordability, and
- flaws in the method for estimating the number of homes needed to support job growth.

It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

Two additional reviews of the SHMA reach similar conclusions, one having been produced by CPRE and the other by Cllr. David Reeve.

The Land Assessment

I object

The exclusion of sites of 5 dwellings or fewer from the list might make administration easier, but the addition of these sites plus windfalls and outstanding (but current) permissions gives rise to a higher number of dwellings than is actually needed. There is therefore no justification for release of all the Green Belt put forward.

The criteria used to include or exclude sites because of this study lack consistency, with many sites excluded as 'unsuitable' with no further explanation offered (many of which were in the urban area of Ash). The assessment lacks objectivity and detail.

Green Belt & Countryside Study

I object

GBC’s Green Belt & Countryside Study does not value appropriately the “fundamental aim” of Metropolitan Green Belt or look strategically at options for developing in major settlement areas beyond the Green Belt. It is pointless for London to apply constraints to protect its Green Belt if areas within it, such as Guildford, choose to ignore this option. It is the same Green Belt and serves the same purposes, all of which are acutely valuable.

The way Green Belt is parcelled up and scored is invalid: serving 2 Green Belt functions well is as legitimate as serving 3 to 5 functions less effectively. The Green Belt sensitivity analysis is not a valid basis for informing decisions. This method also omits purpose one, on the basis that all Green Belt sites encourage regeneration of urban sites. This should not be excluded for it is valid and could even be argued to be particularly valid in areas close to the town. Boundaries used for Blackwell Farm were neither permanent nor defensible.

Proposed removal from the Green Belt of a number of relatively small sites where development of an exceptional nature has taken place, plus adjoining land, has lost sight of the scale at which Green Belt is effective.

Assessment of which villages to take out of the Green Belt does not adequately consider that villages contribute to the openness of the Green Belt, as seen from surrounding AONB.

A key principle of Green Belt is its permanence. The University Consultants stated this 13 years ago when seeking permission to take Manor Farm out of the Green Belt to create Manor Park. They reassured residents that the boundary would not be frequently moved and that Blackwell Farm would be opened up to the public for “informal recreation”. The same Consultant has now repeated this promise in putting forward the University plans to develop on Blackwell Farm, saying that the new boundary would be permanent for at least 25 years!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
The Plan preparation process has had inadequate regard for national policy, which attaches “great importance” to the “openness” and “permanence” of Green Belt. The test of “exceptional circumstances” that might justify allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a strategic level.

The Sustainability Appraisal seems to have lost sight of the concept of Sustainable Development as described in the National Planning Policy Framework to the extent that we question whether it complies with the requirement.

The report states that there are no pollution issues in Guildford. This is not true. The A3 end of the B3000 exceeds Eu regulations and this should be flagged

I object

The 2015/2016 air quality management report has not yet been published and this will/should include an area at the A3 end of Compton, which exceeds the recommended max NO2 reading. One year results for NOx are **48.728 with high's of 68 using National bias adjustment**.

Cllr Furniss indicated that the location of the test tubes may have made them invalid, but measurements show that they were positioned correctly and monitored for over a year by GBC environment officers, who have now added additional monitoring devices (See Annex 2 – Correspondence between Cllr Curtis and Cllr Furniss). This area qualifies as an air quality management area (AQMA) and it is disingenuous to omit this from the report or to use an old report on the basis that the 2015 report is not yet published, as the problem is known and recognised by the environment department within GBC.

The traffic survey shows increases in overall flow at the B3000 monitoring point, of values between 5.6% and 16.5%. This would severely impact flow, which is not in line with National Policy as further congestion would exacerbate the current air quality issues as the A3 end of the Street.

I do not believe that a regulation 19 consultation is appropriate. Whilst few changes have been made, additional sites have been included without opportunity for regulation 18-consultation input.

The video used and paid for by GBC and taxpayers is biased towards development, and hence raises questions over the validity and legality of such marketing campaigns. All the individuals featured in the video, with the exception of one nurse...
have previously spoken in the Council Chamber in favour of house building/building on Blackwell Farm; and there is not a single voice representing protection of the Countryside or outstanding landscapes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** SQLP16/1648  **Respondent:** 15299201 / Samira Abdullah  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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**I object**

The plan is not so much positively prepared as avariciously prepared. I do not consider that it is reasonable to take on unmet need from neighbouring authorities, which have given greater protection to their Green Belt if it means our own is compromised on the scale being put forward.

*I believe that constraints should be applied to the housing target, which we understand equates to the objectively assessed need (OAN) as no reasonable constraints have been applied. The constraints that could and should be applied are Greenbelt and considerable infrastructure issues. The solutions suggested to accommodate the inordinate levels of growth are both inadequate and costly and the net result will be serious debt for many years if not generations.*

It was recommended by landscape consultant Alison Farmer Associates that the area known, as Blackwell Farm should be considered in the AONB boundary review, yet it was omitted in Surrey CC’s landscape evaluation. This meant the Parish Councils of Worplesdon, Compton and Wanborough had to fund an independent review to ascertain whether the area was a contender for AONB classification. The survey was carried out by in May 2016 by Land Management Services Ltd, which concluded that most of the 265 hectare farm was of a landscape and scenic quality that merited inclusion within Natural England’s revised Surrey Hills AONB boundary.

It raises serious question about the soundness of the evidence base when Surrey CC says that it only has to account for evidence submitted and not for that omitted? **The area within the proposed development site at Blackwell Farm should now be considered by Surrey Hills as part of the AONB boundary review and land to the west should remain undeveloped, as it is important to the setting of the AONB.**

The plan is not justified. Residents groups have suggested other strategies but these have not been tested or considered against the current trajectory, which has remained largely unchanged since day one.

Many aspects of the Plan were strongly objected to in 2014 and not only have these points been ignored, they have in fact been embellished or made worse. I refer to the points that GBC referred to in their own summary, which stated that most people objected to the scale of development and the harm to the Green Belt. At that time there were 4 strategic sites and now there are 5. At that time approx 50% of development was in Green Belt and now it is 66% with only 34% on previously developed sites. 58% of development is on just 5 sites.

*I more realistic appraisal of the town centre with more multi-storey car park development and less retail would make way for a greater percentage of housing in the town centre, which is after all the most sustainable and sought after area. Additionally, greater pressure must be placed on the University to house more students at Manor Park in order to free up affordable rented accommodation in the town for key workers.*
There is a conflict of interest when the developer (University) drags its feet over the provision of promised student accommodation (thereby putting pressure on the housing market) whilst at the same time seeking permission to build 1,800 new homes to help Guildford's need? The University is at least five years behind with programme of building student residences and staff housing. It is widely agreed among residents groups that the University must fulfil all of its current building plans and substantially increase the proportion of students on campus. If the University built the outstanding units, the housing need would reduce substantially yet much of this is omitted from the outstanding permissions list?

GBC has approached development without applying constraints that are applicable such as Green Belt and infrastructure. It is wholly inappropriate to build a Plan without constraints when there is widespread opposition to this approach. Furthermore, there are serious doubts over the validity of the objectively assessed housing need. Housing need underpins the entire plan, and we are being asked to accept the figure of 693 on trust. Without an understanding of the methodology behind the OAN, the public cannot 'buy into' this figure, especially as it has been illustrated by two reputable professionals that there have been errors such as 'double accounting', which has resulted in uplift. Both consultants have concluded that a more accurate figure would be around 500 new homes pa and the most recent one, which was done in pre Brexit -June 2016 acknowledges that due to the high number of International students here in Guildford a student SHMA would better inform this plan. Both consultants feel that the current SHMA is flawed and that the OAN of 693 is too high. These reviews will be submitted by CPRE and the GRA and we support the findings of both.

Putting 58% of development on 5 sites, which are within the Green Belt, or largely within the Green Belt, is not consistent with national policy. The definition of 'exceptional' is forming an exception or rare instance; unusual; extraordinary. What possible exceptional circumstances can justify 3 sites of approx 2,000 each and two of 1000 each, on Greenbelt. This makes a mockery of the term 'exceptional'?

The plan has a maximum number and a hefty buffer. It has underestimated windfalls and overestimated need. It is likely therefore that if one of the major sites fails to come through, the Plan could still succeed in terms of numbers, but would fail in terms of impact on infrastructure and reliance on aspirational, but distant 'yet to be discussed' schemes such as railway stations, making the plan undeliverable. If more people are not given the opportunity to live in Guildford town, the night time economy cannot grow and if the gamble to use 40% of the land for retail fails, shops will close and we will have created a leafy green ghost town, whilst the villages outside the town will have changed beyond all recognition as the impact of urban sprawl takes its toll.

The plan puts many eggs into 5 baskets with 58% of all development on just 5 sites. If these are not deliverable, the plan will fail. This strategy has been roundly criticised by Inspectors in other parts of the country.

Taking on such a high OAN without scrutinising it and then taking land out of Green Belt to fulfil it, and using developer funding to secure infrastructure (which reduces significantly the proportion of affordable housing delivered) is destructive and risky.

It is inconceivable that 5 sites between 1,100 and 2,000+ each can be built on Green Belt land without affecting the purposes of the Green Belt.

AONB should be given the highest protection. Despite being put forward for AONB review Blackwell Farm was omitted and an independent consultant had to be commissioned by local parish councils. The findings showed that the area met Natural England’s latest criteria for AONB and should not therefore be developed but should instead be properly recognised.

The proposal at Blackwell Farm has been reduced from 2100 to 1800 to take account the impact on future AONB or for views in and out of the existing and future AONB from public areas as determined by planning policy. It is feared that if this site were approved and if access could be made possible without causing serious problems to the surrounding road network, that the AONB in this location would undoubtedly be destroyed.

GBC argues that it is necessary to remove more than 1.6% of its 89% Green Belt and to remove more than 6% of its Green Belt from villages (by way of insetting) in order to meet its need, yet at the same time the Council advocates making an additional area Green Belt? The area of land being put forward for inclusion within the Green belt is on the same ridge as two areas of Green Belt it wishes to remove (Normandy & Blackwell Farm). This approach lacks consistency.
Cllrs Paul Spooner and Matt Furniss have stated clearly that there will be no development without supporting infrastructure and that the infrastructure must come before, or alongside, development. It is difficult to see how this will materialise as developers’ CIL contributions (which will fund infrastructure) are paid from profits made from the development. This statement appears to be unenforceable and could offer false reassurance to residents who may support the Plan on this basis.

Developers are being asked to fund large amounts of infrastructure. They will offset this against any agreement for affordable housing and it is highly possible that affordable housing will not be built or that only a small proportion will be built. This was one of the key drivers and is factored into the housing need, yet may not be delivered. Where is the general analysis to see what level of affordable housing might actually be delivered given the level of infrastructure needed to implement this level of development on new sites?

The omission of the Town Centre Master Plan (on the basis that this has different timescales) invalidates two key components of the Plan - the Infrastructure and Highways assessments. The suggested road closures in the town centre and the resulting re-routing of traffic should be factored into the highways assessment, but they are currently omitted. The consequences of this could render the whole Plan undeliverable and I don’t believe the Plan can be approved without factoring in the Town Centre Master Plan.

GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA), which CPRE and GRA consider unsound. The methodology for the uplift and assumptions made have not been made available and thus the openness and transparency required for public understanding as outlined in the NPPF has not been adhered to.

I understand that Highways England will not start to consider its intentions as regards the A3 in the vicinity of Guildford until 2018. It is difficult to see how plans can be approved without the inclusion of this information.

Network Rail has not made available for the public consultation any plans for a new railway station at Merrow, nor have we been told where the station car park would be situated nor how the railway bridge between Merrow and Burpham would be re-constructed to take the additional traffic. Likewise, there are no detailed plans for the railway station at Park Barn and Network Rail has not confirmed the status of either. These schemes must have a sounder footing to be included in the Plan if they are to be used to justify large developments nearby.

The access to, and from, Blackwell Farm (via the A31) has not been thought through. There proposed new route will likely be used as a rat run to the A3/Guildford, but this will put pressure on a congestion hot spot, and result in increased traffic at the Compton turn-off and Down Lane (home to Watts Gallery). It is also recognised that congestion at the Tesco roundabout will be made worse and this area is already subject to considerable problems. Additional traffic via the business park from Blackwell Farm will add to congestion at the Egerton roundabout and impede access for emergency services to the hospital.

The proposal at Blackwell Farm has been reduced from 2100 to 1800 to take account of the AONB, but this does not account for views in and out of the AONB from public areas.

The greenbelt sensitivity study is not objective. The reference to Blackwell Farm as ‘South West Guildford Urban’ is totally misleading as it is unadulterated countryside that fulfills all the purposes of Green Belt. I consider this Study, which was the subject of much criticism in the last plan, to be flawed, yet it remains in this Plan. Why?

The damage caused to the Green Belt by the addition of Blackwell Farm would outweigh benefits gained from development, as there is ample space and lapsed planning permission on the existing Manor Park land for development for student accommodation, which would free up affordable rented accommodation in the town.

The proposal for Garlic Arch was added to the draft Local Plan without any consultation under Regulation 18.

No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Guildford citizens.

No land has been safeguarded for a tunnel, which would show a real intent.
This consultation included 'significant changes' according to GBC, although most residents would strongly dispute this. Some key reports were added and 6 weeks was not long enough to properly digest the information and impart this to residents. Many additional questions had to be asked and many points required clarification, which essentially meant adequate information, was not made available until two thirds of the way through the consultation.

The level of objection at the 2014 consultation was considerable - these objections have NOT been dealt with, but have been carried through to a regulation 19 consultation, undeterred. This is not in the spirit of Localism or the NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1649  Respondent: 15299201 / Samira Abdullah  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Cooperation is a two-way street. Guildford objected to Waverley's plans for Dunsfold on the grounds of increased traffic and in the same submission referred to positive consideration of unfulfilled OAN. Guildford also refers to its duty to consider Woking's unfulfilled housing. Guildford does not have land to spare to assist Waverley or Woking without taking vast amounts of land out of Green/belt, which is protected by the NPPF. Greed is not 'an exceptional circumstance' and if both Woking and Waverley (and indeed London as it is the Metropolitan Green Belt) prefer to protect their Green Belt then the question must be asked as to why Guildford is happy to relinquish its Green Belt land, especially in the face of strong public opposition.

Many also question the choice of just Woking and Waverley as partners in the SHMA as there are considerable links with Aldershot and Farnborough in Rushmoor, which have very different needs and their inclusion could have provided a better balance.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1650  Respondent: 15299201 / Samira Abdullah  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the inclusion of Blackwell Farm in the plan and would like to attend the examination.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1651  Respondent: 15299201 / Samira Abdullah  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Comment - Localism

The Plan is supposed to be informed by residents and by parish councils and residents' groups and their input used to formulate the Local Plan, not for it simply to be presented to them and objections and subsequent input ignored. Despite a great deal of effort from these groups and many like-minded responses, the Plan has not taken their concerns on board. The Plan has barely changed since day one and residents feel their views have been ignored and that the consultations have not been genuine. To add insult to injury, some of the key points raised have actually been exacerbated or made worse, such as the scale of development and harm to the Green Belt and issues over infrastructure.

The NPPF is open to interpretation, but it is our belief that GBC has chosen to interpret it in a way that lacks objectivity in an effort to appease developers in order to avoid costly court cases at a later stage. GBC has cited cases where development has been granted in an effort to justify this pro-development stance but has failed to balance this against the many sites where development has been refused.

To gain true public reaction, material presented has to be factual and unbiased and written without jargon and acronyms. This has not been the case. A degree of 'double speak' has led to absurdities such as 'affordable housing' which is over £300,000 i.e. ten times the average salary; 'safeguarding' which does not mean protection of land as most people would think, but rather potential future development and 'insetting' which means removal? It is recognised that these terms are not locally derived but all the same they are confusing for most of us.

Some Councillors have shown a lack of knowledge about environmental matters. Cllr. Gunning - webcast 24th May section 7 - 3:39

'About ancient woodlands, of course they are very attractive things, but they are ancient and trees don't last forever, so can we be practical about ancient woodlands and consider their value or their life, I should say, their life'

May 11th - Cllr Ellwood announced that he couldn't understand what all the fuss was about pollution as his Mother had lived (presumably unaffected by it) under the flight path at Heathrow?

Whilst people have been encouraged to take part in consultation, objectors have been subjected to name calling and public humiliation. There are too many examples to list and so I am listing the most recent. http://www.guildford-dragon.com/2016/07/10/letter-not-surprised-mr-patons-comparison/#comment-157440

The Local Plan has divided communities and highlighted weaknesses and alliances, which have resulted in a breakdown of trust between residents and those whose job it is to implement the Plan.
The Plan has been roundly criticized and objected to and yet it is presented to us once again. Many feel the consultations to date have been worthless and feel they have already made their points, which were ignored and will not therefore be making them again as they fail to see the point?

It simply is not possible to address infrastructure shortfalls by building in the hope that developers contributions will cover the costs as the level of development needed negates any benefits gained and in many cases, the situation is made worse.

Central government funding is needed to address current problems so that funding from development can be used to implement additional infrastructure needed to make new sites viable without damaging their surroundings. It must be accepted that geography and lack of previous investment leaves some areas with less opportunity to do this than others.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/1174  Respondent: 15299201  /  Samira Abdullah  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1365  Respondent: 15299233  /  Alan Le Jeune  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A47

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Whilst I recognise the need for more housing in Guildford, I strongly believe building in Normandy is not the best option. It will create considerable traffic jams, damage the green belt countryside and wildlife and ruin what is now a nice village. I strongly recommend that this proposal be scrapped and a more suitable site be considered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/832  Respondent: 15299361 / Jane Finlay  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It is doubtful that the proposal of 13,000 plus houses to be developed are reasonable and sustainable, particularly in view of Brexit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2811  Respondent: 15299361 / Jane Finlay  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We need LOW COST housing schemes and small developments to meet local need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2810  Respondent: 15299361 / Jane Finlay  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object most strongly to the traffic congestion any additional development will cause to our local villages due to inadequate road infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to not protecting the Green Belt. The Green Belt is there to protect our green open spaces for future generations to enjoy as we have done over the years.

The environment will be spoilt forever with these large developments if they go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to all development in areas at risk from flooding.

Any development carried out in or around this area, will add to the flooding, which so often occurs in the Wey and Mid Thames Valleys and any additional large developments will just add to the misery for those who live in those areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I strongly object to the Local Plan which is unsustainable, flawed and I question the credibility of the report by Hearns as being an independent, non-bias report.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

1. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

2. Having determined housing need the Council was entitled to consider constraints before determining the housing number. We believe that as well as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as well as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First we believe constraints should have been applied. Secondly we believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

3. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term...
considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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SITES - POLICIES A1 TO A57

Each of these objections relates to each of the sites in the Green Belt.

We object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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POLICY A25 - Gosden Hill Farm

We object to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds we believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement (see also below).

We object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon-a road which is already under traffic stress (see also below).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY A43 AND A43a – Garlick’s Arch

We object to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

We have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.
It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham school was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, a primary school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site. Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2831  Respondent: 15299425 / Tim and June Yorath  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY D3 - Historic environment

We object to this policy as it is very weak and we do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which we fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2832  Respondent: 15299425 / Tim and June Yorath  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
**POLICY D4 - Development in urban areas and inset villages**

We object to this policy:

1. The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

2. The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>PSLPP16/2826</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**POLICY E1 - Meeting employment needs**

We object to this policy.

1. We object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

2. The site is in any event subject to frequent flooding and unsuitable for development.

3. We object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy E2</td>
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### POLICY E2 - Location for new employment floorspace

We object to this policy.

It would be more sensible to confine new office and research and development floor space to the urban Guildford area. We also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy E6</td>
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### POLICY E6 - The leisure and visitor experience

We object to this policy.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature.

Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy E6</td>
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POLICY E7 Guildford Town Centre

We object to this policy.

1 The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. We suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

2 There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

3 There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

4 The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

5 The policy also fails to provide guidance on design requirements, as required by the NPPF.

6 The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY H1 – Homes for all

We object to this policy.

A greater proportion than 60% of Surrey University students should be housed in university accommodation. The university should be encouraged through this Plan and the planning process to increase provision of university accommodation. It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinized or evaluated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H2 – Affordable homes

We object to this policy on the grounds it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H3 – Rural Exception Homes

We object to this policy for a number of reasons:

1. The wording of the policy is far too wide and drives a coach and horses through all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

2. The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations were available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

3. The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

4. The policy wording should define small, either in land size or number of units. We are concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

5. The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular we believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

6. The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

7. The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

**POLICY I1 - Infrastructure and delivery**

We object to this policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

| Comment ID: | PSLPP16/2834 | Respondent: 15299425 / Tim and June Yorath | Agent: |
| Document: | Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

**POLICY I2 - Supporting the Department of Transport’s “Road Investment Strategy”**

We object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).
Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

POLICY P1 – Surrey Hills Area of Outstanding Natural Beauty

We object to this policy as we are concerned it policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. This welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated. It should be tightened up.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

POLICY P2 – Green Belt

We object to this policy.

1. It does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

2. The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the...
borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

3. Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of green belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

4. The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. We believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

5. As mentioned above we note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and we consider this to be a deliberate untruth which compromises the consultation process. We would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (We assume the document was delivered to most houses in the Borough.) We reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

6. We object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them. We also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

7. To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. We cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead. This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

8. Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” We believe this should be deleted as an untruth.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>PSLPP16/2819</th>
<th>Respondent:</th>
<th>15299425 / Tim and June Yorath</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
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</table>
General Comment on Policies

The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little. Comments on specific policies

POLICY S1 – Presumption in favour of sustainable development

We object to this policy. The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2820   Respondent: 15299425 / Tim and June Yorath   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY S2 – Borough Wide Strategy

We object to Policy S2 on a number of grounds:

1. The housing number of 13,860 new homes is excessive. The number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

2. The number is in any event based on an arbitrary and inappropriate Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. Rushmoor is excluded in spite of it being easily reached from Guildford town centre. An HMA should be an area within which a majority of people live, work, shop or study. On any commonsense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton, Haslemere, Reigate and Redhill and Basingstoke but all lie well outside “West Surrey”. Guildford is in the London commuter belt and part of a far wider and more complex housing market.

3. These concerns have been raised repeatedly since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinize it. The absence of a ready alternative, however, does not make “West Surrey” as a Housing market Area reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

4. The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. We have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

5. The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

6. The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN were not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

7. It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand,
would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

8. The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

9. This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. We believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

10. The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

11. The Plan is out of balance in proposing 36% of all new housing in the three wards of Lovelace, Send and Clandon and Horsley. These are currently rural areas whose identities will be greatly and detrimentally changed by these proposals.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
General comments:
We have serious, general objections to the plan which are summarized below as well as being expanded upon in our comments on numbered policies in the draft plan.

- In common with many others we do not believe the housing figure has been properly calculated and we believe it overstates housing need. The Council has prevented Councillors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

- The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

- We do not believe the draft plan accords with the NPPF policies on protecting the Green Belt.

- Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not itself a very special circumstance justifying an indiscriminate removal of sites from the Green Belt. Having properly calculated a housing needs number, constraints should be applied to it to reflect the Green Belt and AONB. Each proposed Green Belt site then needs to be considered on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft plan does not demonstrate that this has been done. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

- Stronger assurances should be included in the plan that development can only commence when required infrastructure improvements have been secured.

- The A247 through Clandon is overburdened by traffic already and is unsuitable as an A road in any event. In parts it is too narrow for two lorries to pass and lorries routinely mount the pavement at speed in a dangerous fashion. We believe the plan should include proposals to provide other routes for traffic to take traffic away from the A247.

- We object to the Gosden Hill proposal. We do not believe very exceptional circumstances have been shown to justify taking this site out of the Green Belt. Even if the Gosden Hill development were to remain in the plan we believe the boundary should be explicitly drawn so as to prevent it being visible from West Clandon. In addition development should be conditional on the A3 improvements and new railway station.

- We object to the Garlick’s Arch proposal. This site was removed from consideration before the previous draft of the plan was issued. We do not understand how this site has been brought back into the plan. We do not believe exceptional circumstances have been shown to justify taking this site out of the Green Belt. The site was not discussed in the Green Belt and Countryside study and there seems to have been no consideration of the justification for removing it from the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I have just become aware of the proposals for extensive housing in and around Guildford. Whilst I appreciate that there is a shortage of low cost and social housing in this area, I feel that the number of houses proposed to be built is excessive. Such development would not only put too much strain on services but would also eat into the Green Belt land which would impact on quality of life of existing and new residents alike.

I understand that some high density ie high rise housing is proposed. The two existing residential blocks along the Portsmouth Road have been a blot on Guildford's landscape since they were built. There has been endless evidence to show such schemes have failed not only from a town planning viewpoint but more particularly from the position of those living there.

I urge the council to deal with these proposals by exercising balance so that some new housing can be provided without destroying the beauty and unique identity of Guildford. In this way those who come to live here can enjoy the benefit that those of us who have lived here for some time have enjoyed for so long.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1. I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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1. The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. **Why was a brownfield site removed and replaced by a Greenfield site?**

There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hour no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. **How will the local services such as schools and doctors cope, many of which are already at capacity?** (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
1. I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2858  Respondent: 15300385 / Mark Harding  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2855  Respondent: 15300385 / Mark Harding  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2856  Respondent: 15300385 / Mark Harding  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2857  Respondent: 15300385 / Mark Harding  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2864  Respondent: 15300385 / Mark Harding  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. I OBJECT to (POLICY H1 – Homes for all). Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim to be necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. POLICY H3 – Rural Exception Homes

I OBJECT as this is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.
The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

1. I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision for the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2860  Respondent: 15300385 / Mark Harding  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT due to the congestion development will cause to the trunk roads A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/2861  **Respondent:** 15300385 / Mark Harding  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

1. **I OBJECT to poor air quality concerns (Policy I3)**

   Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/2853  **Respondent:** 15300385 / Mark Harding  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

1. **I OBJECT to not protecting the Green Belt (Policy P2)**

   I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ or the land to be taken from the Green Belt. Once taken the green belt is lost forever!!

   There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

   Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan:

1 I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and West Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

2 I OBJECT to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.
2. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.
3. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and why were Councillors not allowed to scrutinise it? The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500
units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/650  Respondent: 15300385 / Mark Harding  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)
   - The “objectively assessed need” figure of 693 homes a year is too high.
   - A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
   - The current SHMA inflates the proposed housing figure due to
     - failure to correct for errors in the historical data for international migration flows,
     - issues with the way it considers students and affordability and
     - flaws in the method for estimating the number of homes needed to support job growth.
   - It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable. Why is this so?

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe
inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflates the ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.
11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.
12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.
13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.
14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.
9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.
10. The impact on small surrounding roads will create traffic gridlock.
11. It will join up existing villages and defeat the purpose of the Green Belt.
12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.
13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2836  Respondent: 15300385 / Mark Harding  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/537  Respondent: 15300385 / Mark Harding  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which
overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPS16/1379  **Respondent:** 15300513 / Paul Worsfold  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation A35- for the phased development of a new settlement of up to 2100 dwellings.

I object to the draft Local Plan for the following key reasons:

I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be
subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

I object to the detrimental impact on transport, local roads and road I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.

2. The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.

3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.

4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).

5. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU permitted. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.

I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning Officers.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.
Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2388  Respondent: 15300513 / Paul Worsfold  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I continue to object to the plans for Three Farms Meadows in the draft Local Plan for after the initial plan was overwhelmingly rejected by the full GBC planning committee.

It is an unsustainable site identified in all versions of the plan because of the Infrastructure constraints of the site and the physical location.

The railway stations identified in the application are linked to the site by inadequate country roads. There have been a number of serious accidents within 200 meters of the site in the last year with current levels of traffic.

There is nothing in the application that considers the current traffic problems and congestion. EG Painshill junction of A245 and A3. Also the high numbers of cars and coaches visiting the world famous Royal Horticultural Garden Wisley opposite the site seem to have been ignored.

Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc). The application suggests that Plough Lane (in a flood plain) and Ockham lane are a possible route for a new public transport service, linking new residents with many of the key services mentioned by the developer (shops, services, station, local hospital, etc). Use by cyclists of local narrow country lane will delay transport further. The applicant puts great weight on sustainable transport, walking and cycling which is ridiculous on narrow, twisting lanes with no footpaths.

There is very little employment available onsite. A majority of residents will have to travel to work. Few will be able find work within a reasonable distance using sustainable transport meaning vehicular forms of will be required.

Suggestions that the use of Woking station as a major hub are laughable as the use of Wisely Road running past the RHS garden entrance and over the narrow canal and bridges (single carriageway) is limited to small numbers of vehicles. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”

I note that the new plans are increased in area, the south of the site faces the Surrey Hills AONB and will have a negative impact on the vie

I note that the new plans include an additional 3.1 ha from the green belt without any justification ...
I am a little concerned that the GBC has not explained their reasons for rejecting the original planning application in a timely way.

I am mystified by the transport analysis undertaken by the applicants consultants. The data seems to contradict the figures supplied in the plans by a Government Transport department to modify Junction 10 to ease what they consider is a highly congested junction.

I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

I note that pollution levels nearby at Junction 10 exceed recommended levels. Building more houses and further motorised transport will exacerbate the problem for current affected residents.

I consider for the reasons listed above and numerous other reasons that this application be rejected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID:</th>
<th>PSLPA16/846</th>
<th>Respondent:</th>
<th>15300833 / Emma Vigan</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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Guildford Borough Proposed Submission Local Plan: Strategies and Sites June-July 2016 Consultation

I am at present enjoying one of my very frequent visits (2 or 3 per annum) to my parents in West Horsley, in company with my 2 children- unfortunately due to work pressures my husband has to be elsewhere. Together with my 3 sisters I was brought up in West Horsley so I have high regards for it. I am not at all happy by what I have read about the above, and wish to protest.

The Green Belt Act 1948 established green belts in perpetuity. They cannot be moved at will by planners as is proposed here. Legislation requires that new housing has to be of a similar character and density to what is there at present. Common sense dictates that there be adequate roads, schools, medical facilities and drainage etc to accommodate any huge increase in population brought about by a large increase in housing in an area.

From what I have seen, none of these conditions has been fulfilled. Therefore the proposed developments should not go ahead. Please register my objection.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object very strongly to the proposals in your new local plan, particularly on the way they impact on West Horsley.

First, I object to your proposal to take our village out of the Green Belt. We value very highly the rural character of West Horsley, and we selected this house mainly because of that. One of the essential characteristics of Green Belt is its openness and permanence (National Planning Policy Framework, para 79).

Second, your plan says nothing about infrastructure but proposes an increase in the number of homes in the village of almost 40%. Local schools are already full, medical facilities are already stretched, it is difficult even now to find parking spaces at the railway station or in the village, and the roads system would need to be considerably improved to cope with extra traffic. I object to the urbanisation that these changes would make necessary.

Third, our home is at the southern end of The Street and in a Conservation Area. This is meant to give us extra protection against development. Your plan includes a proposal to build 40 new homes on Bell & Colville land which is adjacent to our property and I object very strongly to this development. Apart from the difficulties for access to and from the site, it would completely negate the benefits intended in a Conservation Area. Access to the site would be extremely hazardous in my opinion. If access was from the A246 Guildford to Leatherhead road, there is already heavy traffic at all times of day but as it would be so close to the entrance to Cranmore School, it would become extremely congested at the beginning and end of the school day. It is already heavily congested at these times. If access was from The Street, this would be even more hazardous as The Street is a narrow village street with houses on both sides and a dangerous bend at exactly the spot where access would have to be. In my view this would be asking for trouble, accidents and other incidents involving school children, their families and normal commuters.

Please take note of my objections and think again.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am greatly concerned about the strategic housing market assessment plans for the future of housing in east and west Horsley and also for their removal from the Green Belt which seems to me a political move and not one of consideration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2868  Respondent: 15300961 / Mercia Underwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The traffic on Forest Road from early morning to late evening is already so heavy that one has to wait and wait to cross to visit or shop or get to Surrey gardens.

The car park at Effingham Junction station is already full each day. Motorists even parking on the common road. East Horsely station car park would not be able to cope with an influx of commuters.

Understanding that development will be required in the future, I feel that the numbers cited are beyond reality. Little thought seems to have been given to the load on old infrastructure and drainage, school populations, transport or medical services. There seems to be no understanding of existing facilities in the villages or what might be required in the future.

Hoping that more careful thought and planning will be given to the future of these areas and the concerns of the residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2867  Respondent: 15300993 / Sally Wright  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

With some 5000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2866  Respondent: 15300993 / Sally Wright  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to not protecting the Green Belt (Policy P2)

I strongly object to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages and the land to be taken from the Green Belt. Once taken the green belt is lost forever. This is one of the reasons I chose to move to Ripley.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objections to Guildford Borough Proposed Submission Local Plan June 2016

I am emailing you today as I very strongly object to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is totally unsustainable, and in many provisions, unnecessary.

Please see below why I object to the local plan.

1. I object to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
These all require increased car use and will lead to increased congestion and so air pollution and higher carbon dioxide emissions and a few solar panels on roofs will not compensate for the considerable environmental cost.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2870  Respondent: 15301089 / Brian Yeomans  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy D4: Development in urban areas and inset villages

I OBJECT to this policy

In the case of urban development there are numerous flaws, including:

- The plan envisages that 40% of homes built will be affordable, but this does not provide any accommodation for low paid workers, for example, those on the minimum wage, who cannot afford to buy “affordable” homes, nor can they pay the so-called “affordable” rent. There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low paid workers such as those employed in the retail, warehousing and distribution sectors.
- The number of homes planned in the urban area is too low – there is a need for regeneration in some areas, but this is ignored and instead the plan concentrates on building homes on green field sites, which does not meet the needs for housing within the town, especially with the centre. This is not a sustainable policy as building outside the town has a disproportionate effect on road traffic.

The plan envisages a large expansion of the traditional “bricks and mortar” retail sector, but this is a sector in long term decline.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2871  Respondent: 15301089 / Brian Yeomans  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy E1: Sustainable employment

I OBJECT to this policy

• the evidence base is unreliable
• there is unclear differentiation between B class uses
• only high added-value business uses are desirable, not low grade, low employment warehousing which is land hungry
• industrial and commercial businesses must be concentrated in the urban area, or existing business parks (eg Slyfield) not in the rural environment which the infrastructure is unable to support
• the rural environment must support micro or high tech businesses, agricultural industries, and tourism, and these sectors must not be damaged by general industrial development which is inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2872  Respondent: 15301089 / Brian Yeomans  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E2: Location for new employment floorspace

I OBJECT to this policy

In my opinion all new office and research and development (use Class B1a and B1b) floor space should be within Guildford town centre. I do not support the policy of expanding the Research Park onto Blackwell Farm and we do not believe there are exceptional circumstances to justify incursion into this permanent and high quality area of Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2873  Respondent: 15301089 / Brian Yeomans  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy E3: Maintaining employment capacity and improving employment floorspace

I OBJECT to this policy.

I do not support the policy of resisting change of use from B1a to residential because it flies in the face of positive property market solutions for the regeneration of brownfield land and is contrary to current government policy which has recently been reaffirmed and permits a change of use from B1a (offices) to C3 (residential).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2874  Respondent: 15301089 / Brian Yeomans  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E7: Guildford Town Centre

I OBJECT to this policy

There should be much more residential use of the town centre. There is limited need for further retail, which will disadvantage existing retailers as well as using valuable land inefficiently. There is an urgent need for a brownfield register and to focus on brownfield redevelopment before considering development outside the existing urban area. CIL strategy must promote brownfield redevelopment

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2875  Respondent: 15301089 / Brian Yeomans  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy H1: Homes for all

I OBJECT to this policy

The housing mix is based on the assumptions set out in the Strategic Housing Market Assessment (SHMA) which has not been scrutinised or evaluated. I support high density development in the urban area. On campus dedicated student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up suitable family accommodation in the urban area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2876  Respondent:  15301089 / Brian Yeomans  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy H2: Affordable homes

I OBJECT to this policy

“Affordable” homes, under national definitions, means homes which are sold or rented at 80% of market value. Even at 70% rented this means that these homes will not be cheap, and starter homes will not be made available for local people. There is a viability clause (4.2.40) which means that in practice this could be unenforceable. We would be losing countryside for no local benefit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2877  Respondent:  15301089 / Brian Yeomans  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy H3: Rural exception homes

I OBJECT to this policy

This policy allows potential development OUTSIDE settlements even in Green Belt and includes wording to propose extension of this policy for Market housing. This is a Trojan horse to allow development where it would not otherwise be permitted. Far from being exceptional, this policy seeks to introduce a scheme where housing could be built anywhere, with no restriction, other than the general link to some form of connection with the Guildford housing list.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2878  Respondent: 15301089 / Brian Yeomans  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy I1: Infrastructure and delivery

I OBJECT to this policy.

- Various aspects of Infrastructure are acknowledged as congested, inadequate for the existing population and not able to accommodate much growth. However, greenfield sites – requiring heavy infrastructure investment – are targeted in order to generate CIL income for the council. This is not sensible. The current draft CIL scale also encourages development on greenfield sites rather than brownfield.

- The methodology commissioned by the Council to assess traffic and the corresponding roads infrastructure needs is inadequate for the purpose of the Local Plan and identifies only the tip of the iceberg in terms of existing congestion. Looking at local traffic situations around the Borough it becomes clear that the schemes proposed will not solve congestion and the local road network has not been given sufficient consideration. Under the growth proposed some locations would require highway schemes that involve demolition of property and road-widening in residential areas to solve the resultant congestion. Even the A3 improvements are not guaranteed to take place but they are being used to justify removing large areas from the Green Belt before detailed traffic assessments have taken place. These detailed investigations are being deferred until the planning application stage and will be left to developers to prepare. If a site then proves to be unsustainable its Green Belt protection will have been lost for no reason and unsuitable development will take place by a more insidious process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2879  Respondent: 15301089 / Brian Yeomans  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy I2: Supporting the Department for Transport’s “Road Investment Strategy”

I OBJECT to this policy.

- This policy is concerned only with the strategic road network – the A3 and M25 for which the responsibility and decision-making lies with Highways England. It is only reasonable that the council will work closely with Highways England to ensure that the Local Plan does not utilise land in a way that limit the scope for future improvements.

However, the proposals for the A3 are undecided and the council has suggested a very expensive tunnel proposal that, even if HE decided to go ahead with it, is unlikely to be delivered until the end of the plan period. Less expensive alternative A3 improvements would not be delivered before implementation of the current draft Local Plan and would deliver a massive growth in traffic. The road improvements are likely to lead to significant disruption to traffic during the construction phase on top of an already overloaded road network. It would be folly to make matters worse by committing to such a large housing number and the only logical conclusion is that a very significant traffic constraint should be applied to the OAN for this Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2880  Respondent: 15301089 / Brian Yeomans  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy I3: Sustainable transport for new developments

I OBJECT to this policy.

- The practicalities of sustainable transport have not been properly considered, it is not sustainable to build dormitory towns and call them sustainable. Not everyone can cycle all the time.

- Large developments outside the town centre cannot maximise sustainable travel. The further from the town centre, the less sustainable the development will be.

- Reliance on cycling discriminates against vulnerable members of the community. How can the disabled, those with small children, or the very old, or the infirm, or those who are ill, cycle outside the town in order to commute, or even inside the town? Only some people cycle – and Guildford has some steep hills, especially
going out of town. Park and rides are slow – how can those with a 3 hour commute add 1 hour to their journey from using park and rides?

The only sustainable mechanism for new developments is to have them in the town centre close to the railway and the main shopping links where a hoppa bus can provide satisfactory links for those who cannot walk or cycle.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2881  Respondent: 15301089 / Brian Yeomans  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P1: Surrey Hills Area of Outstanding Natural Beauty

I OBJECT to this policy.

Whilst the inclusion of a policy to protect the AONB within its submission draft of the Local Plan is welcome I strongly object to Policy P1 and its supporting text, which I consider has weakened the protection of the AONB and the AGLV from the previous draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2882  Respondent: 15301089 / Brian Yeomans  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1279  Respondent: 15301089 / Brian Yeomans  Agent:
I accept the need for more housing, and particularly affordable housing, but there is substantial evidence that the numbers you base the housing need on contain major errors and substantially under-record outward migration. A more robust analysis is required to give confidence in the numbers.

There is a fundamental and growing problem with congestion and inadequate infrastructure which is nowhere near adequately addressed by your proposals. Going ahead with the 2017 Plan will cause harm to the very qualities that underpin the economic success of Guildford and aggravate congestion.

There are inadequate plans to create enough affordable homes. The revised proposal that only 60% of full time Guildford based University students will be provided with accommodation on campus puts unnecessary pressure on housing stock in the town. An 80% target will help by freeing up many more affordable homes relatively quickly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Ref: Policy A44 1.9.ha- land Winds Ridge and Send Hill. 40 homes and two travellers pitches.

I must declare I am utterly opposed to this proposal. This site is new and was not included in the regulations 18 draft, and has not been consulted upon previously.

It's inappropriate with the narrow width of the single track road, of Potters Lane, off the A3 motorway, this gets very congested in the morning and late afternoon, owing to the fact, of the nature of the narrow road. At the top of Potters Lane, the one sided parking and narrowness of the road makes congestion worse. I believe it is a shame that this area will be ruined and blighted by extra traffic, in the vicinity of such a lovely little church. So I utterly oppose this development plan.

Yours sincerely, C.E.Weekley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPA16/851  **Respondent:** 15301185 / David Allen  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Chilworth

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal to inset Chilworth Village from the Green Belt. As it is located in the North Downs, surrounded by the Surrey Hills AONB, and includes the heritage site of Chilworth Gunpowder Mills, Chilworth needs to stay in the Green Belt to protect it from inappropriate development and urban sprawl. There is no justification for insetting it.

The Local Plan refers to only removing areas from the Green Belt for ‘exceptional circumstances’ and I can’t see any justification in the case of Chilworth, as future development would impact on the overlooking Surrey Hills AONB.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/2885  **Respondent:** 15301313 / M Sutton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write to register my objection to the proposal on the above mentioned plan to remove Green Belt protection from the local villages, in particular Chilworth and Shalford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPA16/855  **Respondent:** 15301345 / Pauline Rawlings  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Ripley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Objection to Draft Local Plan

The green belt is not only important to this area, it is beneficial health wise to all residents and visitors.

Ripley cannot cope with the traffic that we have at the moment.

We only have limited public transport.

Our health service and schools will not be able to accommodate the extra new people that you propose.

We do not have a proper foot path from Papercourt Lane to Ripley High Street.

I strongly object to the new development plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1385  Respondent: 15301377 / T and S Padley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We OBJECT to the GBC Draft Borough Plan regarding Site Allocation 46 (Normandy and Flexford) on the following grounds:

• There is no proven case or exceptional circumstance to justify the need for an additional secondary school within the area:
  • Surrey County Council has already proposed that an urban extension at Blackwell Farm ("....would be a more sustainable location...")
  • Kings College, Ash Manor, Connaught School and Hoe Valley Free School are all undersubscribed
  • The birthrate in Guildford has fallen in the past 2 years.

• The road and transport infrastructure has already reached saturation:
  • Local roads will be unable to sustain the additional traffic that will ensue
    ◦ It is difficult to envisage any highway improvements that would relieve this additional load
    ◦ The potential combination of A3 road improvements and major site work within A46 over the next 15 years would be catastrophic; leading to traffic chaos and population health issues.

• This development led proposal will cause irreparable damage to the local environment and will place an unacceptable strain on the local infrastructure:
  • It will destroy ancient woodland, trees, hedgerows, farmland and semi-improved grassland and stream
  • Light, noise and litter pollution will increase due to the influx of humans and domestic animals to the area
• Habitats of protected wildlife species will be damaged and/or destroyed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Objections to GBC Draft Plan re Normandy and Flexford (Site A46)

We OBJECT to the GBC Draft Borough Plan regarding Site Allocation 46 (Normandy and Flexford) on the following grounds:

• There is no proven case or exceptional circumstance to justify the need for an additional secondary school within the area:
  ◦ Surrey County Council has already proposed that an urban extension at Blackwell Farm (“….would be a more sustainable location…”)
  ◦ Kings College, Ash Manor, Connaught School and Hoe Valley Free School are all undersubscribed
  ◦ The birthrate in Guildford has fallen in the past 2 years.

• The road and transport infrastructure has already reached saturation:
  ◦ Local roads will be unable to sustain the additional traffic that will ensue
  ◦ It is difficult to envisage any highway improvements that would relieve this additional load
  ◦ The potential combination of A3 road improvements and major site work within A46 over the next 15 years would be catastrophic; leading to traffic chaos and population health issues.

• This development led proposal will cause irreparable damage to the local environment and will place an unacceptable strain on the local infrastructure:
  ◦ It will destroy ancient woodland, trees, hedgerows, farmland and semi-improved grassland and stream
  ◦ Light, noise and litter pollution will increase due to the influx of humans and domestic animals to the area

Habitats of protected wildlife species will be damaged and/or destroyed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3515  Respondent: 15301377 / T and S Padley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Comment ID: PSLPA16/857  Respondent: 15301409 / Marian Simonds  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
7. I OBJECT TO THE LACK OF IMMEDIATE PROVISION FOR NEW SCHOOLS
8. I OBJECT TO THE LACK OF ANY IMMEDIATE PROVISION FOR DOCTORS SURGERIES

Our legacy should not be to destroy the special villages and countryside environment we have all chosen to live in.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
In my opinion it is exceptionally sad that the removal of the green belt status has been proposed.

Removal of the green belt and the subsequent urbanisation of our villages and countryside is a one way decision. Once destroyed the countryside is gone forever.

In principal I am not against the development of new homes but it feels like the removal of the green belt and the disproportionate amount of proposed development is being made without any consideration of the infrastructure in our local area. P2

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2888  Respondent: 15301409 / Marian Simonds  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Specifically

1. I OBJECT TO ALL EROSION OF THE GREEN BELT

2. I OBJECT TO ALL "IN SETTING" OF ANY VILLAGES FROM THE GREEN BELT

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2889  Respondent: 15301409 / Marian Simonds  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3. I OBJECT TO THE DISPROPORTIONATE AMOUNT OF DEVELOPMENT IN ONE AREA OF THE BOROUGH

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: SQLP16/652  Respondent: 15301409 / Marian Simonds  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

6. I OBJECT TO THE LACK OF EVIDENCE FOR THE ALLEGED HOUSING NEED NUMBERS

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/651  Respondent: 15301409 / Marian Simonds  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4. I OBJECT TO THE LIMITED CONSULTATION PERIOD

5. I OBJECT TO THE LAST MINUTE INCLUSION OF NEW SITES WITH LESS THAN 2 WEEKS NOTICE

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/863  Respondent: 15301601 / Tina Grear  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans. It also fails to take into account the new situation due to Brexit, a factor which makes the draft Local Plan now appear hopelessly out of date.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/1387</th>
<th>Respondent: 15301601 / Tina Grear</th>
<th>Agent:</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

**Objections to the continued inclusion in the Guildford Borough Council Proposed Local Plan (June 2016) of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation for the phased development of a new settlement of up to 2100 dwellings**

I object to the inclusion of FWA/TFM in the draft Local Plan for the following key reasons:

1) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt.

   The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt. FWA/TFM is prime green belt, and was given to the country for an airfield as part of the war effort, based on the promise that the land would be returned to the community after the need for an airfield had passed. This promise has been broken, and no effort has been made to see whether there is a moral or equitable duty to return this land to the existing community.

2) I object to the disproportionate allocation of housing in this particular part of the Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

3) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties The plan calls for a village of 159 residences (with narrow lanes, no street lights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

4) I object to the detrimental impact on transport, local roads and road

   I specifically object to:

   1. The lack of suitable public The local rail stations of Effingham Junction and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity
   2. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
3. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
4. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
5. The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
6. The assertion that the development will result in a meaningful shift to cycling and The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars

5) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

6) I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU permitted Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation. In particular, two schools should not be planned in the FWA/TFM area which is known to have poor air quality, which will only be exacerbated by the planned development.

7) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.

8) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 9th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Those reasons remain valid, and there are no adequate ways to overcome them.

9) Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2893  Respondent: 15301601 / Tina Grear  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being broken.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: PSLPP16/2896  **Respondent:** 15301601 / Tina Grear  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

*Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )*

*Answer (if comment is on questions 1-7 of the questionnaire): ()*

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I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: PSLPS16/1388  **Respondent:** 15301761 / Paul Norman  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

*Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )*

*Answer (if comment is on questions 1-7 of the questionnaire): ()*

• NEW A3 JUNCTION - the notion of a 4 way junction onto the A3 at Burnt Common would NOT alleviate any of the current traffic issues in and around Send and Ripley - on the contrary it would ATTRACT more traffic as it would be seen as an 'easy' option to using the current Ripley North bound and Burnt Common South bound access ramps on to the A3. Both Send & Ripley cannot take an increase in traffic without severe detriment to the quality of everyday life be it frustration in traffic jams or ill-health caused by increased pollution.

• DEVELOPMENT AT GARLICKS ARCH - This is a new proposed site and has not been consulted upon previously and no exceptional circumstances have been put forward to justify this inappropriate development within the Green The site has a particular conservation sensitivity as it is covered in ancient woodland where some trees are reported as 500 years old. The proposal includes for Industrial development which could easily be provided at nearby Slyfield Industrial Estate where current infrastructure could be upgraded to cope with such increase.
• **LACK OF CONSULTATION** - There are sites in the Draft Local Plan that were not included in the Regulation 18 draft such as Garlicks Arch, Winds Ridge and Send Hill and have **NOT** been considered upon previously. One of the sites is reported to be unsafe by way of land fill waste and is therefore unsuitable for development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID: PSLP16/2901  Respondent: 15301761 / Paul Norman  Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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• **SCHOOLS** - there appears to be no provision within the Council proposals for any immediate provision for any new schools or extension to existing schools, most of which are already under extreme pressure through oversized classes and lack of funding.

• **HEALTH SERVICES** - there appears to be no provision in the Council proposals for any immediate provision for any new medical facilities such as Doctors Surgeries or extensions to existing facilities.

• **TRANSPORT** the introduction of a proposed 14,000 homes in the Borough will put an unacceptable and unsustainable pressure on public services that are already failing the public due to cut backs and lack of investment. Many residents will prefer to use their own vehicles to go even short distances and suffer the inevitable traffic jams, rather than use a public transport system that simply does not encourage its use.

I trust that the above points are clear and that my objection will be recorded along with the many thousands of others the Council will undoubtedly receive as a result of their unworkable and highly unpopular development plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID: PSLP16/2898  Respondent: 15301761 / Paul Norman  Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. **GREEN BELT EROSION** - Ripley, Wisley, Clandon and Send should not be removed from the Green Belt. Send provides a buffer between Woking and Guildford. The Green Belt was originally formed to avoid amalgamation of villages into towns and towns into cities, by unregulated development or Urban Sprawl. Much has been made in recent years of the plight of certain species of birds and reptiles and destruction of their habitats by development - and yet the Council are exacerbating this process in their wanton desire to take the easy and cheapest option and develop in the Green Belt - home to a myriad of Flora and Fauna. The Green Belt should be left alone and more use made of existing developed (brown field) land - a prime example being Wisley Airfield.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/2899  **Respondent:** 15301761 / Paul Norman  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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**DISPROPORTIONATE DEVELOPMENT** - The Council are proposing thousands of houses in Send, Ripley and Wisley, areas that already suffer horrendous traffic issues as main feeder routes to the A3 and M25. The whole road network is under extreme pressure during rush hours and in the event of traffic accidents or roadworks gridlock is often the result.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp172/1321  **Respondent:** 15301761 / Paul Norman  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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**POLICY A42 – CLOCKBARN NURSERY, TANNERY LANE**

- The increase in the number of residential units from 45 to 60 (+15) is over a 30% uplift on a relatively small site and will lead to a cramped overdevelopment and an unacceptable increase in hardstanding to accommodate the increased parking and access roads resulting in further erosion of the Green Belt.
- Tannery Lane is a narrow secondary road that in parts is almost a single track width and therefore traffic problems will be more frequent commencing with the construction of the development requiring large vehicles and plant to manoeuvre into and out of Tannery Lane.
- The junction of Tannery Lane with Send Road is very restricted and requires substantial improvement to accommodate the increased use and to provide adequate safety for both pedestrians and vehicles.
• The proposal would severely impact on the open aspect of the surrounding Green Belt and in particular the views from the River Wey Navigation.
• The increase in units now proposed by the Council completely ignores the hundreds of previous objections made by local people.
• Recent flooding issues in and around the immediate area highlight the need for a conscience approach to development and by increasing the number of residential units on this site the incidence of flooding will be increased.
• The recent approval of the planning application (14/P/02289) for the Cartbridge Traditional Narrowboat Basin on the River Wey Navigation, (construction works are now underway) already puts pressure on the Tannery Lane junctions with Polseden Lane and Send Road. Therefore the cumulative effect of both developments will result in an increase in the potential for accidents at the road junctions unless substantial highway improvements are made. Also there are over 50 parking spaces within the Cartbridge Basin application site which, together with the associated hardstanding, severely impact on the rural nature of the surrounding Green Belt area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1322  Respondent: 15301761 / Paul Norman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY A43 – LAND AT GARLICKS ARCH, SEND MARSH

• The proposal for 400 residential units and 6 travelling showpeoples plots on a Green Belt site is contrary to current policies and ignores the many thousands of objections previously made by local people.
• No ‘Special Circumstances’ exist or have been put forward to justify development on this Green Belt site.
• The development will put extreme pressure on local roads and when considered with the other nearby proposals for development currently being put forward by the Council in the Draft Local Plan, (both residential and commercial/industrial), will result in gridlock at peak times with the resultant detriment to the quality of life and environment in the area, particularly considering the impact that the proposed North and South slip roads on to the A3 would make by drawing more traffic on to the local road network.
• Residential development alongside major highways is known to cause health problems in the very young and old and if this site is developed the long term impact on the residents will in turn put more pressure on local and County Health facilities, particularly if the A3 slip roads abutting one side of the site, (as previously mentioned) are constructed thus increasing traffic flow around the site. The A3 is a major Trunk road that will inevitably become overloaded in the not too distant future given the lack of infrastructure improvements proposed by the Council to cope with the influx of traffic with regard to both proposed imminent and long term development.
• The site contains ancient woodlands and should be protected (and enhanced) against development that might impinge upon the quality of the surrounding area and adversely affect the survival of the trees which are regarded as an important amenity for the area and can be seen from distant views.
• Garlicks Arch adds to the important Green Barrier that separates the villages of Ripley and Send Marsh and any erosion of this will set precedent and eventually result in the merging of the two villages contrary to National Green Belt policy.
• The site is currently designated as within Flood Zone 2/3 and as such development within Flood Plains should be avoided. If development is inevitable then Surface Water mitigation/management must ensure that flood water is properly dealt with and NOT directed so as to cause flooding elsewhere on existing developed land.
• There is no proven demand to accommodate Travelling Showpeople in this area who, by the very nature of their business, will bring more traffic problems for the Ripley and Send villages when transporting very large vehicles to and from the site, where the visual impact of the vehicles and structures when stored, will be detrimental to the surrounding area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1325  Respondent: 15301761 / Paul Norman  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

POLICY A58 – LAND AROUND BURNT COMMON WAREHOUSE LONDON ROAD SEND

• The proposal for commercial/industrial development on this site is contrary to Green Belt policy.
• There are a number of suitable vacant sites and buildings in Slyfield and Guildford and there is no proven need to develop this essentially farmland site.
• The previous development proposal for this site in the 2014 Draft Local Plan was eventually deleted from that plan due to the objections raised. In the 2016 Draft Local Plan the proposal was re-introduced for a MAXIMUM development of 7000m², however in the current 2017 Draft Local Plan the proposal is for a MINIMUM of 7,000m² which could lead to a vast overdevelopment of the site with resulting negative impact on the quality of the surrounding area and the inevitable increase in traffic problems, particularly when considered with the many local developments currently being put forward in the 2017 Draft Local Plan and as stated above.
• The proposed development would be detrimental to the existing residential properties along this section of the London Road by way of increased noise, traffic, environmental and visual impact, including the potential for parked lorries and trailers when arriving at the site ‘out of hours’.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/312  Respondent: 15301761 / Paul Norman  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
POLICY P2 – GREEN BELT – SEND BUSINESS PARK OMISSION

- It is noted in paragraph 4.3.15 that it is intended to inset (exclude) a number of developed sites from the Green Belt, Send Business Park in Tannery Lane being one of them even though there are no ‘Special Circumstances’ put forward to justify this.
- The site is a non-conforming use within the Green Belt however this alone does not justify its exclusion from the Green Belt, in fact there are a myriad of such sites throughout the entire National Green Belt.
- The site is NOT a major developed site within the Green Belt and therefore does not warrant exclusion. The group of existing buildings is not excessive and is surrounded by open fields and the River Wey Navigation therefore the site has an open character (an essential characteristic referred to in Policy P2 paragraph 4.3.12 and 14) and makes an important contribution to the Green Belt.
- If exclusion of this site from the Green Belt designation is intended to promote further development, residential or commercial, then this will only serve to increase the problems of traffic congestion and highway safety along Tannery Lane and its junctions with Poiseden Lane and Send Road particularly at peak flow times.

I trust that the above objections are self-explanatory and I would be grateful if the Council and the Planning Inspectorate would carefully consider the points raised in relation to the proposed alterations made to the 2017 Draft Local Plan and in securing a positive future for Guildford Borough and its residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/2900</th>
<th>Respondent: 15301921 / Deborah Bennesch</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The new draft Local Plan is going to destroy the identity of our villages, clog up the roads with 24hr congestion and take away our Green Belt status- its appalling!!

I enclose my objections to this plan.

I don't want to live in an extended London!!!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/865</th>
<th>Respondent: 15301953 / A Smithers</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send</td>
<td></td>
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</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1) I OBJECT to Send village being taken out of the Green Belt, the Green Belt was intended to be permanent and should remain so.

2) I OBJECT to building 45 houses at Clockbarn Nursery, Tanner Lane is far too narrow and the junction with Send Road very hazardous. Planning permission has been granted for 64 apartments at the Tannery site and for the marina both of which will add to more heavy traffic through the village.

3) I OBJECT to building 400 houses and industrial space at the Garlick Arches. The area is totally unsuitable for houses as the land floods and is also covered by ancient woodland.

4) I OBJECT to the development of 40 houses and 2 travellers pitches at Send Hill again the road is too narrow with single access.

5) I OBJECT to the new interchange with the A3 at Burnt Common, again Send would have to take extra traffic through the village, which would become gridlocked. noise pollution levels are already at excessive levels and would worsen.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3308  Respondent: 15301953 / A Smithers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A42 change at Clockbarn in Tannery Lane because the increase to 60 houses in place of 45 homes is excessive. Tannery Lane is extremely narrow and not wide enough to carry significant increases in traffic. It is already dangerous along the lane and it will impact the open countryside and will unnecessarily erode the Green Belt status of the area. The Marina development has already been approved and the area would be over-development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3310  Respondent: 15301953 / A Smithers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A43 change at Garlick’s Arch to allow for 400 homes and 6 Travelling Show people plots. This proposal will saturate our village as this number of houses is excessive and will destroy the ancient woodland that has existed for hundreds of years. Guildford Borough Council should be protecting this area. It will join up Ripley and Send villages unnecessarily and will erode the Green Belt and generate excessive traffic, blocking the already gridlocked roads. The area is prone to flooding and this proposal will increase the likelihood of further flooding. There is no demand for Travelling Showpeople plots in this area, and ‘no exceptional circumstances’ exist to destroy the Green Belt status of this location. There are other areas in the Borough available for development. This area is already over-burdened, the Doctors surgery and schools are struggling to cope with existing volumes as it is.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3312  Respondent: 15301953 / A Smithers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A58 at Burnt Common because it was deleted from the 2014 draft because of previous objections and there is no requirement in the area for a minimum of 7,000 sq m of industrial warehousing. It will impact the small surrounding roads, and the traffic will be further gridlocked. The Ripley exit off the A3 in both directions is already dangerous with cars speeding through the village to cut through Send and Ripley. There is no demand for industrial warehousing in this area and there are warehouses in Slyfield Green which are purpose built and empty. It will erode the Green Belt further and join up Ripley and Send villages unnecessarily.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1611  Respondent: 15301953 / A Smithers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the proposal to inset Send Business Park from the Green Belt because it is in a restricted vehicular access area along Tannery Lane from both directions and further expansion and development will detract from the natural beauty of the area. The existing infrastructure is not sufficient to cope with any increase in traffic and building development. It will seriously impact the area of outstanding beauty along the Wey Navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1389  Respondent: 15302017 / Gillian Jay  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
  - I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
  - I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London
  - I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
    1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
    2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
      - The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
      - The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
1. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

2. The lack of suitable public The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8} I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9} I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.

10) I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I was upset by and strongly object to Send being removed from Green Belt status. This will permanently alter the character of the village and will only open the way for yet more building development in the future. We live in Send and love the fact it is surrounded by fields which gives it its rural status. With building on the Green Belt land our village feel and status will be irreversibly lost. Green Belt is exactly what it says it is and is there to protect the nature of places, provide open green spaces and enhance the lives of those that live there. Once lost, it is gone forever!

I am concerned and strongly object to the way Guildford Borough Council have tried to 'sneak' these plans through without proper consultation.

Significant changes legally require full consultation under Regulation 18. Since the last consultation major development proposals have been added to the plans and the council are obviously trying to quietly push them through. The 2014 proposal for 430 houses went down to 185 in April 2016. These have now gone up to 485! Every major site proposed for development in Send has been changed and a massive new road junction added on. I am disappointed in the council's underhanded approach to the people of Send.

Send already struggles with the large amount of traffic driving through the village which of ten results in long queues and tail backs. The infrastructure will not be able to cope with all these new build proposals. You cannot just take a small village and dump hundreds of houses and large industrial developments onto it and expect it to work. There are not enough school places, it is already extremely difficult to get a doctor's appointment at the medical centre, the roads will be permanently grid locked and the status of village and village life will be gone forever. We do not wish to be an extension of Guildford but wish to remain a separate village with our own identity.

I strongly object to policy A43.30ha Land at Garlick's Arch. There is no need for more houses on top of the 13,860 already proposed by the borough. It is Green Belt protected by the NPPF which prevents the merging of settlements. It is covered in ancient woodland with trees dating back to the 16th century and once lost, is lost forever. The latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan. Therefore the proposed industrial development of 7000sq m is not needed. The obvious place for any new industrial development is at Slyfield, Guildford - an industrial site already set up and running. There would then be no need to have to build a new 4-way interchange onto the A3 at Burnt Common to serve this industrial development. Surely saving money!

I strongly object to the policy A44. 1.9 HA Land West of Winds Ridge and Send Hill. This has been designated for 40 homes and 2 traveller's pitches.

Where has this come from? It was NOT included in the regulation 18 draft and has NOT been previously consulted on. This is an area of unspoilt natural beauty and should not be destroyed. The subsoil is documented as containing unsafe land fill waste which is currently vented, thereby making it unsuitable for development. Anyone visiting the village will be aware of the enormous volume of traffic it experiences daily especially during morning and evening rush hours and school drop off and collection times. The junction at the bottom of Send Hill already struggles to cope. Adding yet more houses and traveller pitches (with caravans) will make this junction impossible to cope and dangerous. Send Hill is a narrow width single track country road and certainly not built for so much extra daily traffic. Surely common sense dictates this is not a sensible idea.

Thank you for taking the time to read my concerns. Please do not allow Guildford Borough Council to take away the village status of Send with its beautiful surrounding countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1390  Respondent: 15302081 / C.A. Sayers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to new sites (Garlicks Arch) being introduced as an after thought when it was not even considered in the previous plan. A slip road on the A3 at Burnt Common has been added to the Draft Local Plan without Highways England consent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2903  Respondent: 15302081 / C.A. Sayers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to a totally unrealistic number of houses for the country lanes to absorb.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2905  Respondent: 15302081 / C.A. Sayers  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2904  Respondent: 15302081 / C.A. Sayers  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2906  Respondent: 15302081 / C.A. Sayers  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners' views, or the costs involved in improving the infrastructure, currently out side their financial capability.
The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

I object to the 2016 Draft Local Plan as it has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/868  
Respondent: 15303457 / Hannah Green  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I was upset by and strongly object to Send being removed from Green Belt status. This will permanently alter the character of the village and will only open the way for yet more building development in the future. We live in Send and love the fact it is surrounded by fields which gives it its rural status. With building on the Green Belt land our village feel and status will be irreversibly lost. Green Belt is exactly what it says it is and is there to protect the nature of places, provide open green spaces and enhance the lives of those that live there. Once lost, it is gone forever!

I am concerned and strongly object to the way Guildford Borough Council have tried to 'sneak' these plans through without proper consultation. Significant changes legally require full consultation under Regulation 18. Since the last consultation major development proposals have been added to the plans and the council are obviously trying to quietly push them through. The 2014 proposal for 430 houses went down to 185 in April 2016. These have now gone up to 485! Every major site proposed for development in Send has been changed and a massive new road junction added on. I am disappointed in the councils' underhanded approach to the people of Send.

Send already struggles with the large amount of traffic driving through the village which often results in long queues and tail backs. The infrastructure will not be able to cope with all these new build proposals. You cannot just take a small village and dump hundreds of houses and large industrial developments onto it and expect it to work. There are not enough school places, it is already extremely difficult to get a doctor's appointment at the medical centre, the roads will be permanently grid locked and the status of village and village life will be gone forever. We do not wish to be an extension of Guildford but wish to remain a separate village with our own identity.

I strongly object to policy A43.30ha Land at Garlick's Arch. There is no need for more houses on top of the 13,860 already proposed by the borough. It is Green Belt protected by the NPPF which prevents the merging of settlements. It is covered in ancient woodland with trees dating back to the 16th century and once lost, is lost forever. The latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan. Therefore the proposed industrial development of 7000sq m is not needed. The obvious place for any new industrial development is at Slyfield, Guildford - an industrial site already set up and running. There would then be no need to have to build a new 4-way interchange onto the A3 at Burnt Common to serve this industrial development. Surely saving money!
I strongly object to the policy A44. 1.9 HA Land West of Winds Ridge and Send Hill. This has been designated for 40 homes and 2 traveller's pitches. Where has this come from? It was NOT included in the regulation 18 draft and has NOT been previously consulted on. This is an area of unspoilt natural beauty and should not be destroyed. The subsoil is documented as containing unsafe land fill waste which is currently vented, thereby making it unsuitable for development. Anyone visiting the village will be aware of the enormous volume of traffic it experiences daily especially during morning and evening rush hours and school drop off and collection times. The junction at the bottom of Send Hill already struggles to cope. Adding yet more houses and traveller pitches (with caravans) will make this junction impossible to cope and dangerous. Send Hill is a narrow width single track country road and certainly not built for so much extra daily traffic. Surely common sense dictates this is not a sensible idea.

Thank you for taking the time to read my concerns. Please do not allow Guildford Borough Council to take away the village status of Send with its beautiful surrounding countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/354  Respondent: 15303457 / Hannah Green  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the proposal to inset Send Business Park from the Green Belt because:
• It is effectively an old non-conforming user in an area of outstanding natural beauty which will be lost forever with consequent impacts on the quality of life of future generations
• There is highly restricted vehicular access along Tannery lane - in both directions
• Once again, it eliminates the openness of the Green Belt and is inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2685  Respondent: 15303457 / Hannah Green  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Specifically, I strongly object to Policy A42 change at Clockbarn in Tannery Lane because:
• It will cause extreme congestion at the junction with the A247. Already, at certain times of the day during the working week the whole village is gridlocked. This proposal will only serve to exacerbate the problem
• It will remove greenbelt land which gives the village its 'village feel'
• It will damage open countryside views from the River Wey Navigation and create an eye sore
• It will risk increasing the likelihood of surface water flooding

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/2686</th>
<th>Respondent:</th>
<th>15303457 / Hannah Green</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to Policy A43 change at Garlick's Arch because:
• There is no proven demand for Travelling Showpeople plots in this location
• It will cause the village to be 'over-developed' with the consequent impact on local services such as schools and health services which are already stretched
• It will join up the villages of Ripley and Send into one ribbon development and so defeat the key purpose of having a Green Belt
• It is a flood zone 2 area
• It will cause excessive traffic which will increase air pollution and cause congestion

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A58</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to Policy A58 at Burnt Common because:
• It seems unfair to resurrect this idea given all the previous objections resulting in it being deleted from the 2014 plan
• With the increased uncertainty caused by Brexit there is an anticipated decline in demand for industrial land in the South East
• The industrial estate in Slyfield and in other parts of the borough have spare sites and excess capacity
• The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the
whole borough not the proposed huge allocation of over 10 hectares at Send - and in the Green Belt
• Once again, the impact on congestion will be significant

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/870  Respondent: 15303617 / Stephen Green  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I was saddened by and strongly object to Send being removed from Green Belt status. This will permanently alter the character of the village and will open the way for yet more building development in the future. One of the main reasons we have chosen to live in Send is the fact it is surrounded by fields which gives it its rural status. With building on the Green Belt land our village feel arid status will be irreversibly lost. Green Belt is exactly what it says it is and is there to protect the nature of places, provide open green spaces and enhance the lives of those that live there. Once lost, it is lost forever!

I am very concerned and strongly object to the way Guildford Borough Council have tried to get these plans through without, in my opinion, proper consultation. Significant changes legally require full consultation under Regulation 18. Since the last consultation major development proposals have been added to the plans and the council are obviously trying to quietly push them through. The 2014 proposal for 430 houses went down to 185 in April 2016. These have now gone up to 485! Every major site proposed for development in Send has been changed and a massive new road junction added on. I am disappointed in the councils’ approach which has been very underhanded and dishonest to the people of Send.

As you may appreciate, Send already struggles with the large amount of traffic driving through the village which often results in long queues and tail backs. The longest part of my commute to work in Guildford is actually getting out the village of Send in the morning. The infrastructure will not be able to cope with all these new build proposals. There are not enough school places, it is already extremely difficult to get a doctor’s appointment at the medical centre, the roads will be grid locked and the status of village and village life will be gone forever. We do not wish to be an extension of Guildford but wish to remain a separate village with our own identity.

I was shocked by and strongly object to the policy A44. 1.9 HA Land West of Winds Ridge and Send Hill. This has been designated for 40 homes and 2 traveller's pitches. This was NOT included in the regulation 18 draft and has NOT been previously consulted on. This is an area of unspoilt natural beauty and should not be destroyed. The subsoil is documented as containing unsafe land fill waste which is currently vented, thereby making it unsuitable for development. Anyone visiting the village will be aware of the enormous volume of traffic it experiences daily especially during morning and evening rush hours and school drop off and collection times: Adding yet more houses and traveller pitches (with caravans) will make this junction impossible to cope and dangerous. Send Hill is a narrow width single track country road and certainly not built for so much extra daily traffic.

Thank you for taking the time to read my concerns. Please do not allow Guildford Borough Council to 'sacrifice' the village status of Send with its beautiful surrounding countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPA16/875  **Respondent:** 15303649 / Maureen Wilkins  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2. Number of houses required

I disagree with the number of houses required in this plan.

Much uncertainty seems to surround the figure of 693 houses required (SI-IMA figure). This is double the figure quoted only 4 years ago. This figure proposes a disproportionate amount of development to the north of Guildford, which will result in serious affects for Burpham.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPS16/1391  **Respondent:** 15303649 / Maureen Wilkins  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2. Gosden Hill Farm Development

I strongly disagree with the Gosden Hill Farm development.

The proposal of 2,000 houses for Gosden Hill Farm is outrageous. It will increase local traffic to such an extent that there will be considerable strain on the infrastructure of Burpham and surrounding areas.

**Flooding** As we were personally flooded in December 2013 (insurance claim £80,000), the source being the Merrow Lane culvert, we are extremely concerned that all this building on Gosden Hill Farm is going to affect the drainage of the site - which is grass at the moment and will be mainly concrete when it is built on. This will add to flooding risk, not only to the houses around us but to other parts of Burpham.

**Sewage** We are concerned about sewage for this site. Many parts of Burpham are under threat from Sewage spillage after heavy rain. Therefore, this must be one of the main considerations before anything is built on Gosden Hill Farm. New houses were allowed to be built in the New Inn Lane area and have made the problem much worse.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Comment ID: PSLPP16/2912  Respondent: 15303649 / Maureen Wilkins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the amount of traffic that these developments will bring to our area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2908  Respondent: 15303649 / Maureen Wilkins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the 2016 Guildford Draft Local Plan on the following grounds.

1. Loss of Green Belt between Burpham and M25.

The plan does not offer sufficient evidence of exceptional circumstances to justify allocating Green Belt land for strategic developments.

In this plan there is a disproportionate level of development to the north of Guildford and the proposal for Garlicks Arch, Send, Wisley and Gosden Hill Farm will infill the green belt from the northern edge of Burpham right to the M25.

Consequently I object to the loss of Green Belt, especially the land for the Gosden Hill Farm development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/872  Respondent: 15303681 / Nicola Stockbridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley South
OBJECTION TO REMOVE THE HORSLEYS FROM THE GREEN BELT AND SPECIFICALLY TO THE WATERLOO FARM PROPOSED SITE.

I have recently moved into the area, and did so because of the countryside view open to the rear of my property, being the paddock of Waterloo Farm. I had no idea that within a matter of a few months I would be facing the prospect of potentially 120 houses being built to the rear of my property.

I would like to object to this potential site, as it would affect my privacy and light to the rear of my property. This area already suffers from drainage problems and the property to the rear is designated paddock. It would also majorly devalue my property, as it is the privacy and view that I bought my home for. We also have a multitude of wildlife to the rear of the property. Deer often venture into my garden, as well as pheasants, rabbits and many birds. Bats can often be seen in the early evening sky. I seriously doubt this would happen if the paddocks and open land are replaced by new homes.

Horsley is a quiet country village, and with the amount of new homes you hope to build, this will no longer be the case. This is not why myself, and many others, have moved into the area.

I do not believe that the local infrastructure can cope with the numbers of new houses you propose. The schools are full, roads in poor condition, medical facilities stretched, drainage in this area is extremely poor and there is little parking available already.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/3415  **Respondent:** 15303681 / Nicola Stockbridge  **Agent:**

<table>
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**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

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I WANTED TO ADD THE FOLLOWING TO MY OBJECTION BELOW:

I have now discovered that the land behind me (Waterloo Farm) had planning permission refused by the Council in 2014 for three detached houses to be built on my boundary for the following reasons:

R14/P/00012 on 27 Feb 2014:

**THE PROPOSED DEVELOPMENT OF THREE DWELLINGS HAS THE POTENTIAL TO INCREASE THE RISK OF FLOODING IN AN AREA WITH A HIGH RISK OF SURFACE WATER FLOODING. NO INFORMATION HAS BEEN SUBMITTED TO DEMONSTRATE HOW THE DEVELOPMENT WOULD SUCCESSFULLY MITIGATE AGAINST FLOODING. THIS IS CONTRARY TO POLICY AND G1(6) OF THE GUILDFORD BOROUGH LOCAL PLAN 2003 (AS SAVED BY CLG DIRECTION ON 24/9/07) AND GUIDANCE CONTAINED IN THE NATIONAL PLANNING POLICY FRAMEWORK.**

Further this site is constrained by:

- The main sewer along the campsite boundary.
- Sewers and surface water sewers, from Nightingale Crescent crossing the site.
- Flooding and waterlogged ground.
- Existing mature trees on the site and along the boundaries.

I would like to add that with recent weather which has included torrential rain and storms, this water runs all the way down Nightingale Crescent into my garden and literally floods the area around my home. On occasion we have been unable to leave our front door without wellingtons because of the pond that appears. Already this is a problem and will be even more so if this development occurs.
The inclusion of this triangle of land for such a small number of new houses, would have very little impact on your housing figures. It would result in the loss of the Green Belt and create undesirable back land development behind Waterloo Farm, which I have been advised is an important historic building.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/873  Respondent: 15303713 / Patricia Peters  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT in the strongest possible terms to the above plan. It will impose a huge burden on drainage infrastructure, schools, the local roads, medical services, shopping, parking facilities and public transport and at the same time alter the whole character of the West Horsley area and its surrounding villages. At the same time the plan does not address the provision or even consider the need for expanding local services. While not opposed to limited brown field development I do OBJECT to changes to the current Green Belt. These are not necessary or desirable and there is too little attention given to the use of brownfield sites in Guildford city areas,

I particularly OBJECT to the method whereby this plan has regurgitated inaccurate, badly researched and unjustified information and is an obvious ploy to get around the previous objections voiced within West Horsley and, indeed, in all the villages affected.

I OBJECT to being forced to undertake this exercise again and that my previous OBJECTIONS have been put aside. This cannot be democratic.

I OBJECT to Policy Q: Green Belt and the Countryside: Surrey Hills Area of Outstanding Natural Beauty (AONB)

I am totally opposed to the plan affecting all the Guildford Villages and to West Horsley’s removal from the Green Belt by insetting and extending the 2003 boundaries. There are no exceptional circumstances or other justification for the new Green Belt boundaries that will result from the proposed insetting. This study is flawed.

The West Horsley Parish is well established with low housing density settlements with a considerable number of historic buildings and the Council fails to make a case for locating large numbers of homes in the Horsley or neighbouring villages.
I OBJECT to the Polices S1 Presumption in favour of Sustainable Development, Borough Wide Strategy, HI Homes for all, H2 Affordable Homes.

No accurate or acceptable case has been made for provision for 13,800 new homes over the period 2013 to 2033. The number of homes is too high and unsustainable in Guildford's villages. The current infrastructure is strained and at breaking point and there are no plans for addressing the infrastructure.

The proposals for West Horsley are clearly unsustainable for the proposed high volumes of new housing development.

I OBJECT to the development of 385 homes on the proposed sites in West Horsley. The proposals are at much higher densities than currently in the village and will be totally out of character with the existing mix of different housing styles and the layout of the village.

I OBJECT particularly to the proposals for site A40 in that this is the area I know best. The A40 site is unsuitable for development and the Guildford Council has several times rejected applications to build on the site. It has a high water table, is prone to flooding in even medium rain fall and in high rainfall there are problems with flooding of the roads and the overflow of sewage. The work to make such a site suitable for development, even for a third of the homes specified would be out of proportion to any return on capital invested.

The drainage affects are acknowledged by the water authorities who point out that the downstream effects are sizeable and probably uneconomic.

Importantly this is an area of calm, peace and quiet within the green belt and I am reliably informed that there are several species of orchids growing and the land is full of wild life which needs preservation.

The development proposals throughout the village- and also in terms of the knock on effect of the Wisely Airfield proposals- is unsustainable in terms of schooling, drainage, roads capacity, shopping and Rail Station parking, and lack of public transport.

The roads are already at capacity and breaking up under the strain. Traffic uses Ockham Road North as a cut through/rat run when the A3 and M25 are busy or blocked (frequently these days) and this is acknowledged by Surrey County Council roads authority.
There is a major strain on schooling in the area and on medical services. There are few jobs in the area and the practicalities of commuting to London or, indeed to Guildford are heavily affected by the plan.

The strain on the current rail service is obvious and it all but impossible to park at the Horsley rail Station where the parking even after extension works is problematical.

I OBJECT on the grounds that there is no proven need for so many houses to be built in Horsley. It is totally unproven and risks the formation of a dormitory township devoid of infrastructure that could manage such an influx of people and cars.

Any forecast of housing needs is also rendered out of date by the current Referendum related to immigration which will lead to a much lower demand for housing in the future.

It is my understanding that in West Horsley the recent survey of the village in 2014 identified a limited need for only 20 affordable homes.

Guildford Council’s plans are highly suspect and need investigating in depth. Inquiries should be made into the reasons for the document which, for example, must have been completed before the democratic decision, widely applauded, to refuse planning for the Wiseley Airfield site proposal. Yet this proposal appeared again in the council’s plan. The allocation of developments to the various villages is dubious.

Why build on the Green Belt when there is room and land for development within the immediate area of the town of Guildford where it is likely there could be an increased demand.

The National Planning Policy Framework requires that new residential development must respect the character and density of housing in any areas and be limited in quantity by the availability of infrastructure and local facilities.

I couple with that the need and the desire of the people of the area to preserve the GREEN BELT.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPA16/874  **Respondent:** 15303745 / Zackary Stockbridge  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley South

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
OBJECTION TO REMOVE THE HORSELYS FROM THE GREEN BELT AND SPECIFICALLY TO THE WATERLOO FARM PROPOSED SITE

I currently live with my mum at [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998]. We moved here in February and I've been very happy here because we have lots of wildlife in our back garden. We often have deer in the asleep at our back door, as well as pheasants, owls, wood peckers, rabbits and we often see bats early in the morning and late at night. I love living here because we have lots of light in our back garden and a beautiful view of the paddocks, and it's very private. It's lovely to look out my bedroom window at the wildlife and gorgeous trees.

Unfortunately I have not been able to get into the local schools, as we've been told they are full. Raleigh School is on my doorstep but that is also full so my brother cannot attend.

So I'm objecting to you changing my back yard and making my community too busy. I like that it's quiet and has a lovely village feel.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Respondent: 15303905 / E Greenhalgh</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>The comments below represent the issues about which I have some local knowledge and about which I feel strongly.</td>
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<tr>
<td>The Green Belt was originally introduced to prevent ad hoc development and it should still be so other wise England's green and pleasant land will soon disappear.</td>
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<tr>
<td>Guildford is an interesting old town which is surrounded and protected by the Green Belt. In my opinion and that of countless others, this protection should be maintained at all costs. The only people to benefit are the developers.</td>
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<td>To suggest that several villages should be taken out of the Green Belt beggars believe.</td>
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<tr>
<td>I have read the objections raised by West Clandon Parish Council to your Draft Local Plan and I believe that its position raises a number of issues that we at Ryders feel strongly about.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<th>Comment ID: PSLPA16/881</th>
<th>Respondent: 15304065 / Andrea Mills</th>
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I strongly object to the lack of any evidence for the alleged housing need numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2927  Respondent: 15304065 / Andrea Mills  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I strongly object to the lack of immediate provision for new schools.
I strongly object to the lack of any immediate provision for Doctors Surgeries.
I strongly object to the lack of any immediate provision for a new hospital. The Royal Surrey hospital already serves a vast length of the A3 road as the next hospital going south is Portsmouth. The Royal Surrey hospital and other major hospitals situated in the county of Surrey are already stretched to the ultimate limits.
I strongly object to the lack of any immediate provision for new roads to link local and neighbouring towns. The existing roads are already grid locked not only at peak times but now throughout the day with the slightest incident that brings chaos to the local roads.
Junction 10 of the M25 the main hub for Heathrow and Gatwick airports is now regularly at a standstill throughout the day. The proposed 2016 Draft Local Plan would result in many thousands more vehicles (ie cars and commercial vehicles) attempting to get on the M25 at junction 10 and also using the local roads that link towns.
I strongly object to the lack of any immediate provision for new transport links. With grid locked roads new railway tracks will have to be laid. The London underground system will now need to expand into the Guildford Borough especially with a link to the airports also local towns and neighbouring borough towns as all of the current road structure will become impossible to use.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2925  Respondent: 15304065 / Andrea Mills  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I strongly object to the 2016 Draft Local Plan for the following reasons.

I strongly object to all erosion of the Green Belt. Especially as the electorate in the last local elections were promised that the elected councillors would protect the Green Belt

I strongly object to any "in-setting" (ie removal) of any villages from the Green Belt. The proposed 2016 Draft Local Plan by these elected councillors will destroy the local villages of which they were elected on their promise to keep the Green Belt currently surrounding these villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2926  Respondent: 15304065 / Andrea Mills  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (

I strongly object to the disproportionate amount of development in one area of the Borough. The current infrastructures in all of these areas of the Borough are already stretched to the ultimate limits.

I strongly object to the limited consultation period.

I strongly object to the last minute inclusion of new sites with less than two weeks notice.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/884  Respondent: 15304481 / E Roker  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of any evidence for the alleged housing need numbers. Its so sad when you feel to destroy the beautiful Green Belt when there is plenty of brown belt all round that could be used.

We all have problems already trying to get doctors and hospital appointments because every village has too many houses and people.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2929  Respondent: 15304481 / E Roker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to all erosion of the Green Belt.

We need to preserve our Green Belt not destroy it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2931  Respondent: 15304481 / E Roker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to all erosion of the Green Belt.

Please keep these villages in the Green Belt and keep them as individual villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2933  Respondent: 15304481 / E Roker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the disproportionate amount of development in one area of the borough.
I object to the last minute inclusion of new sites with less than 2 weeks notice.
I object to the limited consultation period.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/9145</th>
<th>Respondent: 15304705 / Patricia Aberdeen</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the 2016 Draft Local Plan as below:

Roads the traffic is already terrible here in the morning to the A3 and from 4pm to 7pm constant queues both to the A3 and from it through Burpham and as each house may have two cars chaos will ensue.

It’s no good having 2000 new homes (hopefully affordable not £800,000 to £1,000,000) until you have built schools first. There are no school places in Guildford, also need other infrastructure such as shops, church, parks etc.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/9147</th>
<th>Respondent: 15304705 / Patricia Aberdeen</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Loss of green belt – Hope you have the understanding not to ruin the countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPS16/1395</th>
<th>Respondent: 15304737 / Pamela Orthodoux</th>
<th>Agent:</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
| 4). I object to the inclusion of the land at Garlick's Arch, Send Marsh / Burnt Common and Ripley (A43).  
Garlick's Arch is protected from development as Green Belt. There are no exceptional circumstances which allow for its removal from the Green Belt (Policy P2). Central Government state clearly that housing need is not an exceptional circumstance.  
**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**  
Attached documents: |

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/2940</th>
<th>Respondent: 15304737 / Pamela Orthodoux</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
| 6). Increase in Traffic.  
The inevitable increase in traffic as a result of more housing in this area will create more pollution in the form of exhaust gases and noise which will have an unhealthy effect on residents.  
I wish these objections to be fully taken into consideration and that that Plan is amended accordingly,  
**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**  
Attached documents: |

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/2937</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Page 1352 of 2804
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<tr>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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2). I object to not protecting the Green Belt (Policy P2).

Removing Ripley, Send and Clandon from the Green Belt is unacceptable. These are villages that have always been surrounded by agricultural land that gives them their character. Whilst increasing population requires further housing development, large scale plans such as Wisley airfield and Garlick's Arch are inappropriate in such areas and removing these villages from the Green Belt is just an "underhand way" to allow such developments and more in the future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2938  Respondent: 15304737 / Pamela Orthodoux  Agent: 

<table>
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<tr>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

3). I object to the congestion that the development will cause to the local village roads and the lack of road structure improvement (Policy P3).

The roads around Clandon, Send and Ripley are already congested with frequent long lines of traffic queuing. Narrow roads such as Newark Lane and Rose Lane already struggle with the present amount of traffic. Crossing the road as a pedestrian in these villages can be dangerous. Walking from Grove Heath North to the High Street in Ripley requires crossing Rose Lane often between cars waiting in this road turning left or right into the High Street. This crossing of Rose Lane is not pedestrian friendly and one day someone will get hurt or killed. Any further increase in traffic will only make matters worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2936  Respondent: 15304737 / Pamela Orthodoux  Agent: 

<table>
<thead>
<tr>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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1). I consider the Local Plan as the development proposed is not sustainable (Policy S1).

13,860 new houses proposed is too many for this area. It will have a negative impact on villages such as Clandon, Send and my village Ripley. With no railway station in Send or Ripley, limited bus service, developments at Wisley Airfield and Garlick's Arch will require nearly all adults to own or use a car. I am already unable to park my car in Ripley for a short period to go shopping as all parking spaces (often including Ripley Green) are full. The parking area where White Hart Court used to be has been reduced and is always full. How can more cars help this situation?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/2939</th>
<th>Respondent: 15304737 / Pamela Orthodoux</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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5). I object to the Borough Wide Strategy (Policy S2).

The proposal by Guildford Borough Council for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

The proposals are for too much development in the north east of the borough (Wisley, Ripley & Send). I understand 36% of all the Plans new housing is proposed in this area, which has only 11% of the existing housing. Ultimately all this new housing will merge Wisley, Ripley, Send, Clandon all together and they will cease to be villages and become one large urbanisation!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/887</th>
<th>Respondent: 15304897 / Richard Baker</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **I OBJECT** to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/888  Respondent: 15304897 / Richard Baker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **I OBJECT** to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1396  Respondent: 15304897 / Richard Baker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. 14. **I OBJECT** to Gosden Hill development being in the Local Plan The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.
Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)
It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/1398  **Respondent:** 15304897 / Richard Baker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

1. **I OBJECT** to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

   The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

   The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

   This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

   **What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

   **Attached documents:**

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**Comment ID:** PSLPP16/2948  **Respondent:** 15304897 / Richard Baker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
1. **I OBJECT** to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

**I OBJECT** to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2945  **Respondent:** 15304897 / Richard Baker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

1. **I OBJECT** to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2946  **Respondent:** 15304897 / Richard Baker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**
1. I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2947  
Respondent: 15304897 / Richard Baker  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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1. I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2957  
Respondent: 15304897 / Richard Baker  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.
4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2953  Respondent: 15304897 / Richard Baker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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1. I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.
Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2956  Respondent: 15304897 / Richard Baker  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H3 – Rural Exception Homes

I OBJECT  This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2949  Respondent: 15304897 / Richard Baker  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. **I OBJECT**, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

**I OBJECT** to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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1. **I OBJECT** to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.
Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2951  Respondent: 15304897 / Richard Baker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2952  Respondent: 15304897 / Richard Baker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. **I OBJECT** to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2943  Respondent: 15304897 / Richard Baker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **I OBJECT** to not protecting the Green Belt (Policy P2)

**I OBJECT** to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2944  Respondent: 15304897 / Richard Baker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. **I OBJECT** to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Objections to Guildford Borough Proposed Submission Local Plan (June 2016) from Richard Baker

**I OBJECT** to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan.

1. **I OBJECT** to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options but to be reliant on motor vehicles. These sites are just unsuitable because they are unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for
Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPP16/2942  Respondent: 15304897 / Richard Baker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **I OBJECT** to the Borough Wide Strategy (Policy S2)

   a. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

   b. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

   c. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any commonsense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour, commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

   These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

   It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill...
(Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/903  Respondent: 15304929 / Rosemary Wood  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposed Infrastructure Schedule.

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick's Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/906  Respondent: 15304929 / Rosemary Wood  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

0 The 'objectively assessed need' figure of 693 homes a year is too high.

0 A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.

0 The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.

0 It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan's proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I OBJECT to A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Glandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Glandon at this point will be too narrow and will come under further pressure.
It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of WEt Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data: 2010 -2014 from Crashmap data

- Glandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcoots Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents 2015
- 21 Oct 2015 - P2.47 near shell garage - Three vehicles collided causing delays

Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street - P2.47 closed in both directions
- 28 April 2016 A3 West Glandon London bound between P2.47 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Glandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the P2.47 through West Glandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Glandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.
The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Glandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham's sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Glandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Glandon towards East Glandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England's requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an 'aspiration' in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Glandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1416  Respondent: 15304929 / Rosemary Wood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy A43 and A43a on Garlick's Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Glandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt. I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development on this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A2.47 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement often at speed. It has narrow bends with poor sight lines, an infants school and a hump backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick's Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current 'soft' edge approach to Guildford.

Garlick's Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (BS). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brownfield site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick's Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site?

There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council's own Green Belt & Countryside Report does not address Garlick's Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy 13). The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I OBJECT to the damage to the historic environment as a result of the scale of the proposed development.

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick's Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
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I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will 'enhance' heritage assets which I fear is a developer's charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to Development in urban areas and inset villages.

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2979  Respondent: 15304929 / Rosemary Wood  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the sustainable employment policy.

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick's Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. His unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development. If developed, the new employment site at Garlick's Arch, Send Marsh/Bumi Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7000 sq m of either or a mix of light industrail (B1c), general industrial (B2) and storage and distribution (B8) at Garlick's Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick's Arch site which is in the Green Belt should not be
developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2981  Respondent: 15304929 / Rosemary Wood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace.

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick's Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2990  Respondent: 15304929 / Rosemary Wood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the loss of rural employment.

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick's Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3028  Respondent: 15304929 / Rosemary Wood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment.

Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor 'attractions' and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment 'Disneyfication'. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many 'leisure and visitor attractions' already. The case for creating more is not made and no examples are given. Instead, the plan's explicit priorities should be:

1. To protect the borough's prime leisure and tourism asset, its countryside, from inappropriate This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
2. To help make Guildford's river landscape less off-putting and support town-break packages for high value To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
3. To help private providers market local This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An 'English town break' (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit...
to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3006  Respondent: 15304929 / Rosemary Wood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E7 Guildford Town Centre.

The policy 'vision' describes protecting the Guildford's unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council's own Town Centre Master Plan, the Guildford Vision Group's proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford's character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2999  Respondent: 15304929 / Rosemary Wood  Agent:
I OBJECT to Policy H1 - Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council's timidity is a case of 'regulatory capture' by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students are accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog's Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an 'affordable home' is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will 'affordable homes' be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Do you consider this section of the document: complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure. Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the K2.47 through West Glandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Glandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as WEst Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and
with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Glandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough's infrastructure is already heavily strained. However the plan's determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council's methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy 11. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough's infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic.

It makes implementation critically dependent on providers outside the Council's control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2995  Respondent: 15304929 / Rosemary Wood  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25.

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic
disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2998  Respondent: 15304929 / Rosemary Wood  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  
Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to poor air quality concerns.

Paragraph 4.6.27 of the Plan states that 'Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.' The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2965  Respondent: 15304929 / Rosemary Wood  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  
Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to not protecting the Green Belt.

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council's to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of "only" 1.6% of the borough's Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an 'acceptable' percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the council considers that exceptional circumstances exist to justify amendment of Green Belt. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council's growth aspiration. An important consideration is that more housing need could be met on urban sites than on brown field sites.

I note that the Summer 2016 edition of 'About Guildford' (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the "insetting" of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them. I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the 'openness' of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF's other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To 'inset' two-thirds of the borough's rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough's location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed "insetting" and boundary extensions go ahead. This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17's aim of "empowering local people to shape their surroundings' and other NPPF provisions.
Paragraph 4.3.17 states that 'the general extent of the Green Belt has been retained'. I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called 'strategic sites' of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick's Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing does not constitute a 'special circumstance') to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC's Green Belt & Countryside Report does not address Garlick's Arch, so there is no evidence base to support including this site.

Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding.

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development.

However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough's identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick's Arch (A43) is identified on the Environment Agency's flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council's SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2954  Respondent: 15304929 / Rosemary Wood  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development 'should be seen as a golden thread running through both plan-making and decision-taking." As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of 'sustainable development' is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long term impacts.

The policy states that it aims 'to secure development that secures the economic, social and environmental conditions in the area'. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as 'sustainable', in breach of the NPPF's most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy.

should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications 'wherever possible' and 'without delay' reveals the pro development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all. This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between

Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.
The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles.

These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2958  Respondent: 15304929 / Rosemary Wood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Borough Wide Strategy.

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the "West Surrey" tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, "West Surrey" is much too small. Half of Guildford borough's residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside "West Surrey". Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make "West Surrey" reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour's 'need'. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.
The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford's OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered 'sound'.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is 'deliverable' and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council's cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission.

Constraints in the supply chain and maintaining profit levels have been more important. The plan cannot be considered 'deliverable'. In addition, the number of homes proposed, plus existing planning permissions, plus expected 'windfall' sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a 'plan' that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London's commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Glandon and surrounding area in particular. The developments at Garlick's Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Glandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Glandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.
It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Glandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Glandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/654  Respondent: 15304929 / Rosemary Wood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest 'value creation' areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents' Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/655  Respondent: 15304929 / Rosemary Wood  Agent:
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. 'Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt." Summer 2016 edition of ‘About Guildford' (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

2. The housing OAN figure has been calculated by a process which is not It has not been properly examined by Councillors before being adopted.

3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road i National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are
exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

5. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.

6. The housing number is at least twice the achieved rate of building in the Borough over the last few There is no evidence in the Plan to show that this rate is achievable and sustainable.

7. Much of the infrastructure required to support the level of development proposed is outside the Council's The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer's business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

8. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

9. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Pln consultation

10. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation

11. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound

12. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018

13. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars

14. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham

15. The draft Local Plan will cause further linear development along the A3 between Burpham and West Glandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework

16. The proposal for Garlick's Arch was added to the draft Local Plan without any prior consultation under Regulation 18

17. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/659  Respondent: 15304929 / Rosemary Wood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council's refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement 'Conservatives Say Green Belt To Stay', the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPA16/892  **Respondent:** 15312577 / Freda Ward  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to object to the Local Plan affecting Send on the following grounds:

1. **OBJECT** to the building on the Green Belt at Send at Garlick’s Arch, Clockbarn Nurseries and Send Hill because it is not justified by any special circumstances and the fact that Green Belt is meant to be permanent and not continually eroded.
2. **OBJECT** to the removal of Send from the Green Belt because the village and its countryside provides a necessary buffer between Woking and Guildford.
3. **OBJECT** to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially.
4. **OBJECT** to the proposed industrial development of 7,000 sq m at Garlick’s Arch because it is simply not required since the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan. If there is a need for 7,000 sq m of industrial space it should be at Slyfield where there is a 40ha site available.
5. **OBJECT** to building 45 houses at Clockbarn because of inadequate access and traffic volume. Tannery Lane is far too narrow and bendy to take any more traffic. The junction with Send Road is already very hazardous for
vehicles emerging into the main road. Planning permission has already been given for 64 houses at the Tannery and the marina will generate heavy traffic too. The road cannot take any more

6. **I OBJECT** to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan

7. **I OBJECT** to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.

8. **I OBJECT** to the fact that infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing levels. Roads, doctors and schools will be unable to cope.

9. **I OBJECT** to the development of 40 houses at Send Hill due to its high quality Green Belt amenity within an area of beautiful countryside which would be spoilt. The subsoil of the existing site contains documented unsafe land fill waste which is currently vented. The proposal to include 2 Travellers Pitches is completely inappropriate due to the narrow width single track country road providing insufficient access to the site.

I also want to object to your hypocritical comments in your published newspaper regarding support for the green belt whilst simultaneously proposing to remove so many local villages from its protection.

Please ensure my objections are shown to the Planning Inspector and also provide confirmation that this objection has been received.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send**

**Comment ID:** pslp173/189  **Respondent:** 15312577 / Freda Ward  **Agent:**

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

**I object to the proposal to inset Send Business Park from the Green Belt because:**

- It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
- There is highly restricted vehicular access along Tannery Lane in both directions - this road is already quite dangerous as it is single track in a number of places
- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42**

**Comment ID:** pslp172/1775  **Respondent:** 15312577 / Freda Ward  **Agent:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have lived on Send Road/Send Barns Lane for the last 40 years and I have very serious concerns about the changes to the local plan that will significantly impact Send and the surrounding villages.

I object to the Policy A42 change at Clockbarn in Tannery Lane because:

• The increase to 60 homes in place of 45 homes is 33% more and too much
• It ignores all the hundreds of previous objections made by local people including myself.
• It will worsen access and traffic problems in Tannery Lane and at the A247 junction - there is simply no way this junction can take additional traffic.
• It will make erosion of the Green Belt in our village worse
• It will make surface water flooding, which is already bad, even worse
• It will impact open countryside views from the River Wey Navigation
• The schools in Send Barns Lane are already impacted by traffic and this causes issues at the beginning and end of the school day.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1779  Respondent: 15312577 / Freda Ward  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A43 change at Garlick’s Arch because:

• It ignores all the thousands of previous objections made by local people
• There is no proven demand for Travelling Showpeople plots in this location
• It is beautiful permanent Green Belt and no "exceptional circumstances” exist
• It will cause over-development of our village and the number of homes is excessive
• It is exquisite ancient woodland that existed at the time of Elizabeth I
• It will join up Ripley and Send and defeat the key purpose of Green Belt
• It is subject to frequent flooding and is currently a flood zone 2 allocation
• It is contaminated by lead shot accumulated over fifty years
• It will generate excessive traffic that will block up the local roads of Send and Ripley - this is of significant concern to me as I live on Send Barns Lane, the traffic is already heavy and can also be very fast.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: pslp172/1777  Respondent: 15312577 / Freda Ward  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A 58 at Burnt Common because:

• It was deleted from the 2014 draft because of all the objections made previously
• The word "minimum" is a change from the previous "maximum" in the 2016 plan and since that time there has been a decline in demand for industrial land
• There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units
• The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt.
• The impact on small surrounding roads will create traffic gridlock - this is a very significant issue.
• It will join up existing villages and defeat the purpose of the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/895  Respondent: 15312769 / Norah Johnson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no schedule for Garlick’s Arch (A43), so the Plan takes no account of the infrastructure required for this site. It is therefore not fit for purpose. The council will not be drawn on disclosing the plans and discount the objections at local meetings.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/894  Respondent: 15312769 / Norah Johnson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans.

But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on the Plan, this is yet another example of the lack of transparency and the same can be said of the way that the Garlick’s Arch site was sprung on the locals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1406  Respondent: 15312769 / Norah Johnson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2016).

I am objecting on the following points:

1. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch is protected from development as Green Belt. There are no exceptional circumstances which allow for it’s removal from the Green Belt (Policy P2). Central Government state clearly that housing need is not an exceptional circumstance. The inclusion of this site was added to the Local Plan at the last minute without any consultation or notification to the local residents and as a homeowner in the road that runs alongside this development the local infrastructure, air quality and ancient woodland the site would destroy have all been disregarded.

The Plan states the preference is to use of previously developed land, but GBC have removed a brownfield site at Burnt Common replaced it with Garlick’s Arch. No consultation took place on this, and GBC’s Green Belt & Countryside Report does not even cover Garlick’s Arch.

The site is not appropriate because:

- There is no sustainable transport infrastructure – the roads around the site, apart from the main road are little more than country lanes, at points only one car wide, as soon as the main road backs up, which it does at peak times, cars (including myself) head for the lanes and these will become impassable.
• The site is liable to frequent flooding, every time it rains the Portsmouth Road opposite the site floods despite improvements. At the end of Burnt Common Lane the gas mains becomes flooded regularly and this effects the entire road – check this with the Gas Board who have to pump it out.
• The site has Ancient woodland and is a wildlife habitat, but no wildlife report for the site is in the Plan, Kites, deer and many other species are found on this site.
• There are no plans to improve local schools, medical or utilities to cope – it almost impossible to get an appointment at the local surger as it is.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1408  Respondent: 15312769 / Norah Johnson  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that the site at Garlick’s Arch and Gosden Farm are traversed by electricity pylons.

“A UK study of 29 000 cases of childhood cancer, including 9700 cases of leukaemia, found a raised risk of childhood leukaemia in children who lived within 200 m of high voltage lines at birth compared with those who lived beyond 600m (relative risk 1.7)

There was also a slightly increased risk for those living 200-600 m from the lines at birth (relative risk 1.2, P for trend < 0.01); as this is further than can readily be explained by magnetic fields it may be due to other aetiological factors associated with power lines.”


I wish these objections to be fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1407  Respondent: 15312769 / Norah Johnson  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

North facing ramps to the A3 at Burnt Common would be a disaster for local communities, which do need to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic. E.g. all traffic from London/M25 to Woking would go through Burnt Common, Send and Old Woking. This is not sustainable as this cannot be improved. Once off the A3 at Burnt Common the roads through Clandon have pinch points where it is difficult to drive through if a lorry, coach or bus is coming the other way, this could cause an accident. The Send Road in the other direction is also narrow in places and the amount of extra traffic these new ramps will attract has not been investigated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3010  Respondent: 15312769 / Norah Johnson  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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1. I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

The Garlick’s Arch (A43) proposal would double the built area in the locality, and would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees, habitats for deer and kites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3015  Respondent: 15312769 / Norah Johnson  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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1. I object to the employment strategy and impact at Garlick’s Arch (A43) (Policies E2 and E5)

There is no need for new industrial sites at Garlick’s Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000 sq m proposed. That site was removed from the Plan without any reasoning.
Furthermore the development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been there for decades, employing local people and are therefore clearly sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3005  Respondent: 15312769 / Norah Johnson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

There is too much traffic in our villages already and this plan will cause more congestion in Ripley, Send and Clandon, with no plan to improve that.

The rural roads in this area are narrow, in poor condition and have no footpaths. 5000 more houses means dangerous and unsustainable traffic. Every time there is an accident on the A3 or the M25 the local roads become gridlocked. In the morning and evening the traffic queues through Ripley, along the A3 and onto the M25, more housing with thousands more cars will make the roads impassable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3016  Respondent: 15312769 / Norah Johnson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the lack of proper infrastructure planning for sites (Policy I1)

The Plan does not identify adequate infrastructure improvements to support the huge scale of development, especially at Garlick’s Arch (A43), which has no infrastructure projects in the Infrastructure Schedule to support it. Local services, utilities and sewerage, doctors etc. are at or close to capacity.

There are no plans to improve the capability of the medical and police/emergency services to cover the 5000+ houses in the north east of the borough.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3018  Respondent: 15312769 / Norah Johnson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

The A3 or M25 would have to be improved before any development is done. Highways England has no plans to even start considering improving the A3 before 2020. Clearly no real improvements are possible in the timeframe of this Plan so the developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), should not take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3013  Respondent: 15312769 / Norah Johnson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to poor air quality concerns (Policy I3)

The huge developments being proposed, particularly in the north east of the borough will lead to considerable further congestion and to greater levels of air pollution, which will have a detrimental effect on local residents and their health, no investigations have been disclosed to the local population if any have been carried out.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3004  Respondent: 15312769 / Norah Johnson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick’s Arch (A43). This is a smaller development in keeping with the local environment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to development in areas, which are at risk of flooding (Policy P4)

The Plan does not take adequate account of flood risk as required by National Planning Policy.

The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan. Just a few weeks ago the Portsmouth Road opposite the Garlick’s Arch site was flooded despite the improvements to the river that flows under the road. There are good reasons why I have to maintain a four foot deep ditch that runs alongside my house in Burnt Common Lane, building on the fields will just make the situation worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to the Local Plan as the development proposed is not sustainable (Policy S1)

13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve the infrastructure for Garlick’s Arch. The traffic on the local roads and on the A3 are backed up ready every morning and evening, what will thousands of more cars do for this area?

The development should be in urban areas where there is sustainable transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the Borough Wide Strategy (Policy S2)

GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

The Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing.

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages. This will also increase the amount of traffic heading to the M25, as these new developments will certainly attract commuters, and the there are already long tail backs on the A3 every morning onto the M25 disrupting local travellers and this will only get worse. The Council seem to have completely ignored these problems by promoting so many sites in such a short stretch of the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send</td>
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</table>
I object removing Send Business Park from the Green Belt (4.3.15).

Send Business park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for its insetting (removal) from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1. I object to the unfair imbalance of the Plan across the borough.

With the removal of site A46 from the Plan (with its proposed 1100 houses) and reductions of housing planned in this version of the Plan in other parts of the borough the Plan has become even more biased against the North East of the borough. Guildford Borough is over 100 square miles. Of the 11350 homes proposed in the Plan, 40.6% (4613) are within 3 miles of Send Marsh, most of them on Green Belt. This is grossly unfair on an already overcrowded part of the borough. Why when connection is so bad on the A3 and surrounding roads in this area are you proposing a possible additional 22,000 cars.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to removal of Brownfield sites (A4) from the Plan

Site A4 in Guildford has been removed. This is a perfectly good housing site, within the town centre and therefore with sustainable infrastructure, and would make use of a brownfield site that is in need of redevelopment. The Plan has removed housing from this site, in favour of commercial retail – thereby effectively substituting Green Belt land for retail development, which is totally unacceptable. The amount of empty shops in Guildford, especially at the top of the High Street would surely be a good reason not to increase the retail provision in the town centre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the increase in housing proposed in Tannery Lane (site A42)

This has been increased by a third since the 2016 version of the Plan. This will have a significant impact on the already highly congested local rural road network around Send. This is in contradiction to section 2.14a of the Plan which states "Whilst most local roads are single carriageway, with a lane in each direction, it is at their junctions that the free flow of traffic is most often impeded during peak periods, in some cases resulting in significant delays.” And yet there is no proposals to improve the local roads, only to add more junctions with the A3, thereby increasing congestion on the Trunk and Local road network.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the allocation of 6 Traveling Showpeople sites in A34 Garlick’s Arch

The allocation of 6 Travelling Showpeople plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan. There should be no inclusion of any Travelling Showpeople plots in A43 Garlick’s Arch as this development site is for 400 homes and so is not compliant with the minimum of 500 in as stated in section 4.2.24 of the Plan.

I object to the potential and ill-defined increase in housing allocation at A43 Garlick’s Arch

The potential of an increase from 400 houses at site A43 Garlick’s Arch will be extremely harmful to the rural nature of the surrounding villages of Ripley, Send and Clandon and will cause coalescence of these villages.

The inclusion of site A58 Burt Common, removes the need for A43 Garlick’s Arch)

GBC’s own reasons for including Garlick’s Arch A43 in the 2016 version were

The site [A43] location affords greater separation between Send Marsh/Burnt Common and the proposed site allocation at Gosden Hill Farm, … (site allocation A25) [ than the Burnt Common site did ]”

The site [A43] provides the employment floorspace needed in the plan to help meet identified needs”

Since A58 Burnt Common is now in the Plan (2017) the separation issue is clearly being ignored as BOTH sites (which are almost contiguous) are in the plan; therefore GBC are not following their own guidelines and objectives.

Since A58 Burnt Common is now in the Plan (2017) more than the “required” industrial space is available there, so there is no reason for Garlick’s Arch to be included.

I object to the lack of proper infrastructure planning for sites (A43 and A42)

The Foreword to the plan by Paul Spooner includes on page 5:

“We recognise that significant infrastructure upgrades are required to support existing communities and the planned growth of the borough. The delivery of sites allocated in this plan is contingent upon the provision of new infrastructure, which is a key theme of our Local Plan”.

The lack of any plan for either physical or green infrastructure improvement clearly contradicts this in respect of both A43 Garlick’s Arch and A42 Clockbarn Nursery, Tannery Lane, Send. Development of these sites without the contingent infrastructure would therefore be contrary to the stated aims and themes of the Plan, and should not go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3250  Respondent: 15312769 / Norah Johnson  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The inclusion of site A58 Burt Common, removes the need for A43 Garlick’s Arch

GBC’s own reasons for including Garlick’s Arch A43 in the 2016 version were

*The site [A43] location affords greater separation between Send Marsh/Burnt Common and the proposed site allocation at Gosden Hill Farm, ... (site allocation A25) [ than the Burnt Common site did]*”

*The site [A43] provides the employment floorspace needed in the plan to help meet identified needs*”

Since A58 Burnt Common is now in the Plan (2017) the separation issue is clearly being ignored as BOTH sites (which are almost contiguous) are in the plan; therefore GBC are not following their own guidelines and objectives.

Since A58 Burnt Common is now in the Plan (2017) more than the “required” industrial space is available there, so there is no reason for Garlick’s Arch to be included.

**I object to the proposal for a Waste Management Facility in Green Belt (A58)**

The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned, obscurely in policy 4.423a, and does not allow for full and proper consultation. These facilities are always highly contentious and the Council has a duty of transparency in this regard which it is, at best, neglecting.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy H2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**I object the change in policy on affordable homes (Policy 4.2.23)**

The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”.

The 2017 version says:  *Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.*

So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.

Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses]. That has now been removed, thereby accepting that needing to make greater than normal profit to be an acceptable reason not to deliver affordable homes. This is a shocking sop to the developers.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
I object to the lack of proper infrastructure planning for sites (A43 and A42)

The Foreword to the plan by Paul Spooner includes on page 5:

"We recognise that significant infrastructure upgrades are required to support existing communities and the planned growth of the borough. The delivery of sites allocated in this plan is contingent upon the provision of new infrastructure, which is a key theme of our Local Plan”.

The lack of any plan for either physical or green infrastructure improvement clearly contradicts this in respect of both A43 Garlicks Arch and A42 Clockbarn Nursery, Tannery Lane, Send. Development of these sites without the contingent infrastructure would therefore be contrary to the stated aims and themes of the Plan, and should not go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the extended development in the Green Belt (Policy P2, Site A43)

I object to Garlick’s Arch (A43) being extended and the resulting urban sprawl. There are no exceptional circumstances for this site being removed from the Green Belt, as required by the National Planning Policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
**Comment ID:** PSLPA16/898  **Respondent:** 15312961 / Alison Johnson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

1. **I object to the proposed Infrastructure Schedule (Appendix C)**

The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no schedule for Garlick’s Arch (A43), so the Plan takes no account of the infrastructure required for this site. It is therefore not fit for purpose. The council will not be drawn on disclosing the plans and discount the objections at local meetings.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/897  **Respondent:** 15312961 / Alison Johnson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

1. **I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)**

The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans.

But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on the Plan, this is yet another example of the lack of transparency and the same can be said of the way that the Garlick’s Arch site was sprung on the locals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/1413  Respondent: 15312961 / Alison Johnson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the fact that electricity pylons traverse the site at Garlick’s Arch and Gosden Farm.

“A UK study of 29 000 cases of childhood cancer, including 9700 cases of leukemia, found a raised risk of childhood leukemia in children who lived within 200 m of high voltage lines at birth compared with those who lived beyond 600m (relative risk 1.7)

There was also a slightly increased risk for those living 200-600 m from the lines at birth (relative risk 1.2, P for trend < 0.01); as this is further than can readily be explained by magnetic fields it may be due to other etiological factors associated with power lines.”


I wish these objections to be fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1410  Respondent: 15312961 / Alison Johnson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2016).

I am objecting on the following points:

1. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch is protected from development as Green Belt. There are no exceptional circumstances, which allow for its removal from the Green Belt (Policy P2). Central Government states clearly that housing need is not an exceptional circumstance. The inclusion of this site was added to the Local Plan at the last minute without any consultation or notification to the local residents and as a homeowner in the road that runs alongside this development the local infrastructure, air quality and ancient woodland the site would destroy have all been disregarded.
The Plan states the preference is to use of previously developed land, but GBC have removed a brownfield site at Burnt Common replaced it with Garlick’s Arch. No consultation took place on this, and GBC’s Green Belt & Countryside Report does not even cover Garlick’s Arch.

The site is not appropriate because:

- There is no sustainable transport infrastructure – the roads around the site, apart from the main road are little more than country lanes, at points only one car wide, as soon as the main road backs up, which it does at peak times, cars (including myself) head for the lanes and these will become impassable.
- The site is liable to frequent flooding, every time it rains the Portsmouth Road opposite the site floods despite improvements. At the end of Burnt Common Lane the gas mains becomes flooded regularly and this effects the entire road – check this with the Gas Board who have to pump it out.
- The site has Ancient woodland and is a wildlife habitat, but no wildlife report for the site is in the Plan, Kites, deer and many other species are found on this site.
- There are no plans to improve local schools, medical or utilities to cope – it almost impossible to get an appointment at the local surgery as it is.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1411  Respondent: 15312961 / Alison Johnson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

North facing ramps to the A3 at Burnt Common would be a disaster for local communities, which do need to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic. E.g. all traffic from London/M25 to Woking would go through Burnt Common, Send and Old Woking. This is not sustainable, as this cannot be improved. Once off the A3 at Burnt Common the roads through Clandon have pinch points where it is difficult to drive through if a lorry, coach or bus is coming the other way, this could cause an accident. The Send Road in the other direction is also narrow in places and the amount of extra traffic these new ramps will attract has not ben investigated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3025  Respondent: 15312961 / Alison Johnson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
1. I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

The Garlick’s Arch (A43) proposal would double the built area in the locality, and would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees, habitats for deer and kites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3030  Respondent: 15312961 / Alison Johnson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the employment strategy and impact at Garlick’s Arch (A43) (Policies E2 and E5)

There is no need for new industrial sites at Garlick’s Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000 sq m proposed. That site was removed from the Plan without any reasoning.

Furthermore the development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been there for decades, employing local people and are therefore clearly sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3022  Respondent: 15312961 / Alison Johnson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

There is too much traffic in our villages already and this plan will cause more congestion in Ripley, Send and Clandon, with no plan to improve that.

The rural roads in this area are narrow, in poor condition and have no footpaths. 5000 more houses means dangerous and unsustainable traffic. Every time there is an accident on the A3 or the M25 the local roads become gridlocked. In the morning and evening the traffic queues through Ripley, along the A3 and onto the M25, more housing with thousands more cars will make the roads impassable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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1. I object to the lack of proper infrastructure planning for sites (Policy I1)

The Plan does not identify adequate infrastructure improvements to support the huge scale of development, especially at Garlick’s Arch (A43), which has no infrastructure projects in the Infrastructure Schedule to support it. Local services, utilities and sewerage, doctors etc. are at or close to capacity.

There are no plans to improve the capability of the medical and police/emergency services to cover the 5000+ houses in the north east of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
1. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

The A3 or M25 would have to be improved before any development is done. Highways England has no plans to even start considering improving the A3 before 2020. Clearly no real improvements are possible in the timeframe of this Plan so the developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), should not take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3029  Respondent: 15312961 / Alison Johnson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to poor air quality concerns (Policy I3)

The huge developments being proposed, particularly in the north east of the borough will lead to considerable further congestion and to greater levels of air pollution, which will have a detrimental effect on local residents and their health, no investigations have been disclosed to the local population if any have been carried out.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3021  Respondent: 15312961 / Alison Johnson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick’s Arch (A43). This is a smaller development in keeping with the local environment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to development in areas, which are at risk of flooding (Policy P4)

The Plan does not take adequate account of flood risk as required by National Planning Policy.

The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a **higher** risk than the Council’s own assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan. Just a few weeks ago the Portsmouth Road opposite the Garlick’s Arch site was flooded despite the improvements to the river that flows under the road. There are good reasons why I have to maintain a four foot deep ditch that runs alongside my house in Burnt Common Lane, building on the fields will just make the situation worse.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>Comment ID: PSLPP16/3020</th>
<th>Respondent: 15312961 / Alison Johnson</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the Local Plan as the development proposed is **not sustainable** (Policy S1)

13,860 new houses proposed are not sustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve the infrastructure for Garlick's Arch. The traffic on the local roads and on the A3 is backed up ready every morning and evening, what will thousands of more cars do for this area?

The development should be in urban areas where there is sustainable transport.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLP16/3024  **Respondent:** 15312961 / Alison Johnson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **I object to the Borough Wide Strategy (Policy S2)**

GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure differs from all the other Borough Councils in Surrey.

The Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/ Send [A43] and Clandon [A25]). 36% of the entire Plan’s new housing is proposed in this area, which has only 11% of the existing housing.

5,036 houses are proposed between the M25 and Burpham (about 5 miles), which will obviously lead to a merging urbanisation of identities the villages. This will also increase the amount of traffic heading to the M25, as these new developments will certainly attract commuters, and the there are already long tail backs on the A3 every morning onto the M25 disrupting local travellers and this will only get worse. The Council seem to have completely ignored these problems by promoting so many sites in such a short stretch of the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp172/3470  **Respondent:** 15312961 / Alison Johnson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the amendments to the Local Plan policy A43 changes at Garlick's Arch.

You have totally ignored the 32,000 comments made by the local people and are not representing the wishes of the electorate that put you in office.

You have included provision for travelling show people where no demand has been made at this location.

This is an area of ancient woodland included in the Green Belt and you have shown no 'exceptional circumstances' to build on this area.

To put 400 homes in such a small area is excessive and will join Ripley, Burnt Common and Send together which will take away the character of the villages around Guildford which is a feature of this area.

This area, especially where it joins onto the Portsmouth Road is liable to flooding and it has effected the gas main several times on the corner with Burnt Common Lane and further built development will make this problem worse as there will be less ground to soak up the rain, and is currently a zone 2 allocation.

The fields at Garlick's Arch are contaminated with years of lead shot.

The traffic situation in the area id already at capacity at certain times of day and when there are traffic problems on the A3 and M25 and adding thousands of cars in this area will only cause gridlock.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/3471  Respondent: 15312961 / Alison Johnson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the amendments to the Local Plan policy A58 changes at Burnt Common, London Road.

1. It was deleted from the 2014 draft because of previous objections.
2. The word 'minimum' is a change from the previous 'maximum' in the 2016 plan and there has been a decline in demand for industrial land.
3. Slyfield has empty sites and industrial units and therefore further provision destroying Green Belt is unnecessary.
4. The effect on the small country roads, especially through Clandon and Send will cause problems for lorries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3026  Respondent: 15312993 / M.J. Lindsay  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the exaggerated ambition for growth. This will ruin Guildford.

Related to the above, development should not be given a favourable assumption. Traffic frequently grinds to a halt as it is. Where are all these people and cars supposed to go? I object to the strategy.

The numbers in which the whole thing is based and the calculations based on them seem to be hidden away. I object to this. The supposed need for housing for a growth in population is too high. What about Brexit? House prices become inflated. I object that young families, people born in Guildford and people earning normal salaries are priced out. These people need homes before catering to more executive housing. I object to building on the green belt and in the country rural areas. There seems to be plenty of brownfield but it is in little "pockets" and so not as profitable for developers.

Where has quality of life been factored in? The frustration of all the time spent sitting in traffic-jams deters people from going out. That is a fact. I am an asthma sufferer and the traffic fumes in stationary traffic are really bad.

Where you have so many people having to live crowded in with parents and people who can only afford to rent one room, this is a bad quality of life. We seem to be going backwards. It is too much growth for the wrong reasons and intended to be put in the wrong places. I object to this.

Visitors will not want to come here if they can not move on the roads and it becomes like Croydon. People do not seem to want to use the shops we already have. We do not need more shops. I object to more space being planned for offices, shops, warehouses.

P.S. My car journeys are mainly to and from work, also in Guildford. It is too far to cycle and there is no bus.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/899  Respondent: 15313537 / Philip Mitchell  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am a resident in West Horsley I want to comment on the 2016 new Local Plan.

The plan has identified 4 main sites in the village for housing development with a total of 385 new houses. As we have nearly 1000 existing houses this would mean an increase of about 40%. I am objecting to this very large and unsupportable increase in houses in the village. I appreciate the need for additional houses in the Borough and that our village, and indeed other villages, should take its fair share which should be about 3%, that is 30 new houses. These additional houses could be built without affecting the infrastructure of our community. A 40% increase would put an unsustainable strain on roads, schools, medical services, and drainage.
I also strongly object to the proposal to build on the Green Belt land around our village. Our fair share of 30 new houses could be built within the existing village settlement boundary without any need to build on Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/900  Respondent: 15313601 / Christine Mitchell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I should like to write to express my opinion on the proposed development within the village of West Horsley. Having lived in the village now for 18 years I have experienced the pressures that are already on the services, roads, parking, schools and medical services. An increase in the number of homes of 35%, which is proposed, would put a phenomenal strain on all the above services with the roads especially being unsuitable for such a large increase in the inevitable number of cars and service vehicles that would be required. Many of the roads could not be widened or improved to cater for such an increase in traffic flow. Mentions in the plan do not include the detail of how developments of services within the village will be managed.

In recent years the area has become a magnet for cyclists travelling into the area from a considerable radius because of its rural roads and villages. This is encouraged locally and governmentally. With more traffic on the roads, the potential for accidents will be magnified dramatically.

Of particular concern is the suggestion that West Horsley will be removed from the Green Belt, despite earlier promises that the Metropolitan Green Belt would be protected. The settlement boundaries do not need to be extended if proper use is made of the already available land and a proportionate number of houses (2%) agreed as West Horsley’s share of the number of homes requiring to be built. The number of houses actually required for people choosing to live in the village is very far short of the proposed submission as demonstrated by the neighbourhood plan. (20 affordable homes)

Finally, but of great concern to the villagers, is the strain that will be put on the drainage system. Already sewage overflow problems occur in the neighbourhood and the network would certainly not cope with the demands of so many new homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/901  Respondent: 15313697 / Eloise Haxton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send Marsh/ Burnt Common
Having lived at the above address my whole life, I have spent my childhood playing in the fields and woodlands, and been able to enjoy growing up in a village community which will be lost if the proposed developments go ahead. The traffic has increased already, and the roads are not designed to allow for even more traffic that this will cause.

My objections are;

I OBJECT to the removal of 15 villages, including Ripley and Send, from the green belt. This will lead to wholesale, and often inappropriate developments.

I OBJECT to the fact that GBC have not followed the correct process for Send and Ripley developments. Any significant changes to the 2014 proposals, such as the proposal development of Garlicks Arch, should have required another full consultation, which did not happen. This invalidates the whole process.

I OBJECT to the fact that GBC have failed to provide sound evidence in terms of the Employment Land Needs Assessment which shows that industrial space at Burnt Common IS NO LONGER NEEDED.

I OBJECT to Policy A43.30 the proposed development of Garlicks Arch designated for 400 houses and an industrial estate. This is a new site not included in the Regulation 18 draft and has NOT been consulted on previously. It is not only permanently protected green belt but also a site of ancient woodland with some trees planted in the 16th century.

I OBJECT to policy A43.30 the development of new four way interchange onto the A3 which would mean that narrow Send Road (A247) would be the main route for traffic leaving the M25 and A3. It is already crowded and vulnerable to traffic jams. Further traffic from this development would result in permanent gridlock. It simply would not work.

I OBJECT to policy A44 which would see 40 homes and two travellers' pitches on land west of Winds Ridge and Send Hill. This was again a NEW site NOT included in 18 draft and therefore has NOT been consulted on previously. Once again this is Green Belt land partly containing unsafe landfill. Access is by a narrow lane which could never take the volume of traffic that would ensue from traveller's pitches.

I OBJECT to the fact that the Local Plan takes no account of schools, doctors surgeries and roads that are already operating at full capacity. Another 4000 houses in this area with a conservative estimate of a further 8000 cars would be catastrophic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPS16/1418</th>
<th>Respondent: 15313921 / Nicky, Chris and Thomas Wilson</th>
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1. I object to the very late inclusion of garlick gate and ramp and burnt common (a43 and A43a) on the grounds that it is a green belt and not sustainable and will increase traffic congestion in the local villages and not relieve them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3037  Respondent: 15313921 / Nicky, Chris and Thomas Wilson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

1. The development at gossden farm, Talbot and wisely airfield and the disproportionate number of development to one part of the borough.

Brown field sites need to be developed in Guildford where there is a infrastructure of stations, schools and hospitals to absorb a increase in population.

The local plan was a consultation and has not been listened too, the is far much weight being given to developers wanting to make money.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3036  Respondent: 15313921 / Nicky, Chris and Thomas Wilson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

2. I object to any village being removed from the green belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/905  Respondent: 15314081 / Lynda Camp  Agent:
The purpose of this email is to register my objection to the proposal (contained in your new local plan) to remove Green Belt protection for the village of Chilworth.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Objections to Guildford Borough Council draft Local Plan and to the inclusion in the plan of Site Allocation A35 - the Former Wisley Airfield - for a new settlement with 2,000 dwellings.

I wish to make the following observations:

- The area serves a vital role in preventing urban sprawl from London and a development would create an urban corridor stretching from London to Guildford.
- No exceptional circumstances have been established to warrant removing the site from the Metropolitan Green Belt.
- There is ample brownfield land in urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land.
- The plan calls for Ockham, a hamlet of 159 residences to be merged into a development, on presently open land, with 2,000 dwellings and other urban-style buildings up to five storeys high and a population density higher than most London boroughs.
- Hatchford, south of the M25, has some 60 residences off narrow Ockham Lane that would be greatly affected by the proximity of development.
- Object to the potential harmful impact on transport, local roads and road safety by the suggested development. The result of an additional 2,000 homes would be an estimated 4,000 additional cars together with other vehicles, including HGVs, to service the development.
- Cobham is the closest shopping centre to the proposed development. The village could not cope with the additional traffic and car parking involved in serving some 5,000 additional occupiers at the site and would experience a significant increase in stationary/idling traffic at peak times and at junctions.
• There would be an increase in the already severe congestion on the Strategic Road Network of the A3 and M25 and the junction of those as well as local roads. The current planning application by RHS Wisley would already have significantly added to visitor traffic. Any proposed secondary schooling would add additional congestion.
• There is lack of suitable public transport. The local rail stations of Effingham and Horsley could not cope with the proposed increase in passenger traffic and car parking is already at capacity. In the refused planning application there had been a suggestion that Cobham & Stoke D’Abernon Station could be used. That or use of stations further north at Weybridge or Walton would increase congestion and pollution on local roads in Elmbridge. In terms of traffic movement we are already at a standstill.
• Air pollution in the north of the Borough of Guildford and the south of the Borough of Elmbridge and particularly near the M25/A3 junction already exceeds EU-permitted levels. Additional traffic would worsen the situation, affecting the health of all current and future residents.
• Little or no consideration has been given to the environmental and ecological value of the site and the area around it, taking account of the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
• In coming forward with this site no consideration has been given to the wildlife, some of which is already endangered.

My Objections are supported by the unanimous rejection of application no 15/P/00012 by the Planning Committee at Guildford Borough Council on 8th April 2016 on the recommendation of Planning Officers. The Planning Report identified the serious concerns now being highlighted. I believe I’m correct in saying no members on that committee were in favour of that application. If that was the case its obvious that any future application would receive the same decision and be turned down, not just on Green Belt grounds but also on the many other problems that exist in relation to this site which I have listed above.

This site should be removed from your Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans.

But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1421  Respondent: 15314305 / Andrew Dennis  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch is protected from development as Green Belt. There are no exceptional circumstances which allow for it’s removal from the Green Belt (Policy P2). Central Government state clearly that housing need is not an exceptional circumstance.

The Plan states the preference is to use of previously developed land, but GBC have removed a brownfield site at Burnt Common replaced it with Garlick’s Arch.

The site is not appropriate because:

- There is no sustainable transport infrastructure.
- The site is liable to frequent flooding
- The site has Ancient woodland and is a wildlife habitat, but no wildlife report for the site is in the Plan.
- There are no plans to improve local schools, medical or utilities to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1420  Respondent: 15314305 / Andrew Dennis  Agent:
### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

North facing ramps to the A3 at Burnt Common would be a disaster for local communities, which do need to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic. E.g. all traffic from London/M25 to Woking would go through Burnt Common, Send and Old Woking. This is not sustainable as this cannot be improved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

### Comment ID: PSLPP16/3048  Respondent: 15314305 / Andrew Dennis  Agent:

### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

The Garlick’s Arch (A43) proposal would double the built area in the locality, and would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

### Comment ID: PSLPP16/3051  Respondent: 15314305 / Andrew Dennis  Agent:

### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the employment strategy and impact at Garlick’s Arch (A43) (Policies E2 and E5)

There is no need for new industrial sites at Garlick’s Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000 sq m proposed. That site was removed from the Plan without any reasoning.

Furthermore the development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been for there decades employing local people and are therefore clearly sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

There is too much traffic in our villages already and this plan will cause more congestion in Ripley, Send and Clandon, with no plan to improve that.

The rural roads in this area are narrow, in poor condition and have no footpaths. 5000 more houses means dangerous and unsustainable traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to the lack of proper infrastructure planning for sites (Policy I1)

The Plan does not identify adequate infrastructure improvements to support the huge scale of development, especially at Garlick’s Arch (A43) which has no infrastructure projects in the Infrastructure Schedule to support it. Local services, utilities and sewerage, doctors etc. are at or close to capacity.

There are no plans to improve the capability of the medical and police/emergency services to cover the 5000+ houses in the north east of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

The A3 or M25 would have to be improved before any development is done. Highways England has no plans to even start considering improving the A3 before 2020. Clearly no real improvements are possible in the timeframe of this Plan so the developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), should not take place.

I wish these objections to be fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. **I object to poor air quality concerns (Policy I3)**

The huge developments being proposed, particularly in the north east of the borough will lead to considerable further congestion and to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **I object to not protecting the Green Belt (Policy P2)**

I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick’s Arch (A43).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/3045</th>
<th>Respondent:</th>
<th>15314305 / Andrew Dennis</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **I object to development in areas which are at risk of flooding (Policy P4)**

The Plan does not take adequate account of flood risk as required by National Planning Policy.

The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2016).

These are my main reasons/ I object on these grounds / …

1. I object to the Local Plan as the development proposed is not sustainable (Policy S1)

13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve the infrastructure for Garlick’s Arch.

The development should be in urban areas where there is sustainable transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1. I object to the Borough Wide Strategy (Policy S2)

GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.
The Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing.

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
built, and then having to face the facts that this once quiet and beautiful village has turned into a loud cramped area and to have lost its green belt. I’m sure you would not like these events to happen to your family and I know that the houses will make money but they would mean dropping Horsley’s rural and village atmosphere and it would ruin many family’s opinions of their village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3061  Respondent: 15314497 / D Daulton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objection to the removal of the Green Belt Protection from Peasmarsh, Shalford and Chilworth.

I wish to register my objection to your intention to remove 'Green Belt' protection from the villages within the Guildford Borough Council area.

It is well documented that the infrastructure of the area is under considerable strain and that unrestricted housing development of the area is not sustainable.

I therefore object to your 2016 Local Plan proposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/915  Respondent: 15314561 / Sophie Burrows  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to add my support to the objections of local residents to the proposed development of various areas of Send Village.

Please find my objections below:

- I OBJECT to all erosion of the green belt
I object to site A43 Garlick’s Arch that is proposing 400 new houses
  ◦ The site is often prone to flooding
  ◦ There is already huge amounts of pressure on the Send doctors surgery in attaining appointments, this will only make it worse
  ◦ There is also lack of places available at local schools
  ◦ Traffic is already always bad through Send dip, this is only going to get worse. I work in Guildford town centre, only a few miles away from Send however this often takes over 20 minutes to only reach the A3 at Burntcommon due to heavy traffic

I object to the development of 40 houses and 2 travellers’ pitches at Send Hill
  ◦ This is an extremely inappropriate location

I object to 45 new houses being built at Clockbarn Nursery
  ◦ This also is an inappropriate location due to the large amounts of traffic, and inadequate access. With the 60 or so apartments already granted permission, this will enhance traffic greatly. The area cannot take any more increases in traffic

I object to a new interchange with the A3 at Burnt Common
  ◦ This is already prone to huge amounts of traffic and congestion, this would only increase. Noise and pollution is already an issue around this area

I object to site A45 The Talbot
  ◦ This is overdevelopment in a conservation area

I object to the limited consultation period

I object to the lack of immediate provision for new schools

I hope you take my objections into consideration and that they are passed on to the appropriate councillors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/916  Respondent: 15314593 / Chris Cornelius  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Send Village being removed from the Green Belt. The green belt was intended to be permanent, as required by the National Planning Policy Framework, and there are no special circumstances to justify abandoning it.

I object to building 45 houses at Clockbarn Nursery because of inadequate access and traffic volume in the lane. Tannery Lane is too narrow and twisty to take any more traffic and the junction onto Send Road is already dangerous.

I object to building 400 houses and 7000 sq meters of industrial space at Garlicks Arch, opposite Send Marsh Road. The site floods and is covered by ancient woodland. Industrial space is not needed in the village and additional traffic in the village will be unsafe.

I object to a new interchange with the A3 at Burntcommon. Send village cannot cope with the extra traffic from the proposed 2000 new houses at the Wisley Airfield, 2000 houses at Gosden Hill, Burpham and 1850 at Blackwell Farm. Send Road will become gridlocked, noise and pollution levels are already too high and will increase and the road will be unsafe for our children to walk near.
I object to the development of 40 houses and 2 travellers pitches at Send Hill. It is an inappropriate location because of the narrow width of single access country road with insufficient access. Any development would spoil beautiful countryside and kill off our wonderful wildlife.

Please leave our beautiful village and Green Belt alone, I request that my comments are shown to the Planning Inspector.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/917  Respondent: 15314625 / Carol Bystram  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Chilworth

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am sending you this e/mail to voice my objection to youre proposal to remove the village of Chilworth from the green belt protection area I most strongly object to this proposal and hope you will reconsider this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/919  Respondent: 15314689 / Alice Cole  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

SITES

1. Sites in East and West Horsley

I OBJECT in particular to including Sites A36-41 (East and West Horsley). This is a back-door way to creating a mega-village – essentially, a soulless new dormitory town.

Building 533 new houses on these 6 sites, plus at least another 90 on small sites is (a) excessive in absolute terms and (b) disproportionate relative to the rest of the borough. It will destroy the rural character of these communities.
Under the plan, rural West Horsley will take 35% of new homes, urban Ash and Tongham 16% and Guildford urban area only 11%. The total number of homes in West Horsley will increase by 35%, which is disproportionate when measured against the overall increase in housing across the borough and particularly in Guildford town. The need for so many houses to be built in West Horsley over the first 5 years of the Plan period 2018 to 2033 is totally unproven.

The West Horsley Parish Council and Surrey Community Action Housing Survey: May 2014, identified a limited need for some 20 affordable homes for local people who want to remain in the village, i.e. for young people and for elderly people who wish downsize to a smaller home.

These sites will put unsustainable strain on local facilities and infrastructure, including public transport, parking, schooling, medical facilities, sewage, surface drainage and shops. For instance:

- Thames Water has advised that the current wastewater network will not cope and that the foul drainage system all the way to the treatment works North of Ripley will need to be upgraded.
- Local Schools such as The Raleigh School and the Howard of Effingham are already full and oversubscribed. The plan’s stated intention to reduce traffic on the A3 and its strategic aim that primary schools should be within walking distance will not be met.
- The plan’s Infrastructure Schedule (Appendix C) imagines an “East Horsley and West Horsley traffic management and environmental improvement scheme between 2019 and 2023 by Surrey CC” but gives no details. The proposed level of housing can only harm the local environment, not “improve” it.

The harmful impact of these sites is enhanced by the proximity of the so-called Wisley Airfield site (Three Farms Meadow), with over 2,000 new homes only 2 miles away, which will, amongst other things, affect and further damage the local roads, with ever increasing pot-holes.

Collectively, these 6 sites militate against NPPF paragraph 81’s encouragement of access to the Green Belt and its amenity and recreation value. This has been a success story in the Horsleys, with the creation of an amenity wood and community garden, the purchase of adjacent fields (on the eastern side of Ockham Road North) by local residents in order to preserve their open aspect, well-maintained pitches for local football and cricket clubs, public tennis courts, open space for a high-quality campsite (at Waterloo Farm) used by many tourists and the approval of plans for a “Theatre in the Woods” – making West Horsley the only village in Surrey with an opera house. The open nature of West Horsley determined that a long portion of the 2012 Olympic cycle races passed through the village. This route has since been adopted by cyclists as a permanent asset, including the annual Prudential cycle race. These and future examples of “positive planning” depend on protecting the Green Belt to maintain the openness and attractiveness of the local landscape and avoiding the urbanisation and traffic congestion that Sites A36-41 will bring.

By surrounding Waterloo Farm campsite with 120 new houses, Policy A40 on land to the North of West Horsley will make this rural tourism amenity unviable. This will all accord with developers’ plans, since the site would then be vulnerable to infilling with yet more housing.

Finally, 40% of the development will be classified as affordable (80% of the market value.) Affordable for whom I ask? Certainly not affordable for a great number of people including first time buyers and will not be responding to local need as demonstrated by The West Horsley Parish Council and Surrey Community Action Housing Survey: May 2014. The Key Evidence document Guildford Borough Economic Strategy 2013-2031 makes no case for locating large numbers of homes in West and East Horsley or neighbouring villages.

The first line of Policy P2 states, “We will continue to protect the Metropolitan Green Belt against inappropriate development.”

There is no justification for the proposed large-scale inequitable development within West Horsley, especially the removal of the Green-Belt status, changing beyond all recognition, the rural village settlement which will impact negatively on a whole range of really important matters, some of which have been alluded to earlier on. I would agree to some development but not of this magnitude.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Herewith my Objections to the above Plan:

1. **Green Belt sites**

I OBJECT to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. This ignores the tens of thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014.

All Green Belt sites should be removed from the plan until “exceptional circumstances” for development are proven, as stipulated repeatedly in the National Planning Policy Framework (NPPF 2013) which makes clear ‘that most development in the Green Belt is inappropriate and should only be approved in very special circumstances’.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
It is really disappointing to see that Guildford Borough Council has not sought to constrain its overall housing growth in comparison with other many other councils who have, in order to protect the Green Belt. For years, Green Belt has been wholly protected and should continue to be. It has many proven benefits both for the health and wellbeing of people, and environmental factors. It's not necessary, flawed evidence continues to be used to justify overexpansion.

I therefore object wholeheartedly to no revised GBC changes being proposed since the 2016 consultation to insetting East & West Horsley from the green belt. Greenbelt boundaries should not be moved to cater for this over expansion of development which is not required.

The impact of these far reaching proposals is having a negative impact on many people in the Horsleys, living with this uncertainty over a prolonged period of time. Thousands of people have previously submitted comments on the plans, have the majority of these views being taken note of and implemented? Is there a report which reflects what the majority of views are and whether these have been addressed?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/920  **Respondent:** 15314817 / Mr and Mrs Daniels  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

5) **WE OBJECT TO** the lack of any evidence for the alleged housing needs. Because the Council will not publish the SHMA report, these figures cannot be verified. This lack of transparency is not right for consultation on the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/1425  **Respondent:** 15314817 / Mr and Mrs Daniels  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
2) **WE OBJECT TO** the overdevelopment of Garlicks Arch, Burnt Common/Clandon, The Talbot, Gosden Hill farm and Wisley Airfield, to name but a few... The development is totally inappropriate and unsustainable in the Green Belt.

3) **WE MOST DEFINITELY OBJECT TO** the Traveller Pitches, we have gone through all this before, when they all decided to take over the land at the back of our houses. They do not follow the rules or pay the correct bills, so why should they be given land to live on.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: PSLPP16/3070  
**Respondent:** 15314817 / Mr and Mrs Daniels  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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6) **WE OBJECT TO** the congestion that development will cause to the local village roads and the lack of road infrastructure. There is too much traffic in our villages already and this plan will cause more congestion in Ripley, Send and Clandon, with no plan to improve that. The rural roads in this area are narrow, in poor condition and have no footpaths. 5000 more houses means dangerous and unsustainable traffic.

I wish these objections to be fully taken into consideration and that the Plan is amended accordingly.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: PSLPP16/3069  
**Respondent:** 15314817 / Mr and Mrs Daniels  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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4) **WE OBJECT TO** the disproportionate amount of development, especially in one area of the borough. The Plan is unbalanced across the borough. There is too much development in the north east of the borough (Wisley], Ripley/Send and Clandon). 36% of all the Plan’s new housing is proposed in this area.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Comment ID: PSLPA16/922  Respondent: 15314881 / Gill Haig-Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the removal of Chilworth from the Green belt as proposed in the 2016 Guildford Local Plan. I believe we need the continued protection of the Green belt to stop inappropriate development in our area and I strongly disagree with the proposed removal of Chilworth from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
3) I have been unable to find out what evidence GBC has given for this level of housing need.
   I object to this evidence not being made available.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3074  
Respondent: 15314881 / Gill Haig-Brown  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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5) I object to the plan having no planned infrastructure re roads, travel, hospitals and schools etc

I REQUEST THAT GBC IN THE LIGHT OF THE UK LEAVING THE EU, RE-ANALYSIS THE NEED FOR NEW HOUSING IN THIS AREA WITH TRANSPARENCY AND HARD STATISTICS.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3072  
Respondent: 15314881 / Gill Haig-Brown  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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2) This proposed development will further congest our roads

   Travel time to work along the A3 has increased dramatically over the past 2 years,
   My business has suffered as patients are unable to arrive on time for early appointments
   The slightest problem on the major access roads causes huge gridlock and traffic chaos again impacting my business
   Appointments have been lost due to this congestion resulting in reduced business efficiency
Extra load on the road from the proposed development can only add to the problem and will seriously mean my consideration of relocating away from Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3073  Respondent: 15314881 / Gill Haig-Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4) I object to the sudden erosion of GREEN BELT land when GBC has been so vigilant in protecting it in the past. This is an unacceptable change in GBC policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3071  Respondent: 15314881 / Gill Haig-Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As a resident of Ripley and also a BUSINESS OWNER AND EMPLOYER in the area I am strongly objecting to the DRAFT LOCAL PLAN for the following reasons

1) The disproportionate proposed development in certain areas of the borough

   Whilst I accept there has to be growth in housing, I see it as grossly unfair to burden certain areas more than others

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/926  Respondent: 15314977 / Magaret Cook  Agent:
I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no schedule for Garlick’s Arch (A43), so the Plan takes no account of the infrastructure required for this site. It is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans.

But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1428  Respondent: 15315009 / Edward Dennis  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch is protected from development as Green Belt. There are no exceptional circumstances which allow for it’s removal from the Green Belt (Policy P2). Central Government state clearly that housing need is not an exceptional circumstance.

The Plan states the preference is to use of previously developed land, but GBC have removed a brownfield site at Burnt Common replaced it with Garlick’s Arch.

The site is not appropriate because:

• There is no sustainable transport infrastructure.
• The site is liable to frequent flooding
• The site has Ancient woodland and is a wildlife habitat, but no wildlife report for the site is in the Plan.
• There are no plans to improve local schools, medical or utilities to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1427  Respondent: 15315009 / Edward Dennis  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a
1. I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

North facing ramps to the A3 at Burnt Common would be a disaster for local communities, which do need to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic. E.g. all traffic from London/M25 to Woking would go through Burnt Common, Send and Old Woking. This is not sustainable as this cannot be improved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3080  Respondent: 15315009 / Edward Dennis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

1. I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

The Garlick’s Arch (A43) proposal would double the built area in the locality, and would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3082  Respondent: 15315009 / Edward Dennis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the employment strategy and impact at Garlick’s Arch (A43) (Policies E2 and E5)

There is no need for new industrial sites at Garlick’s Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000 sq m proposed. That site was removed from the Plan without any reasoning.

Furthermore the development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been for there decades employing local people and are therefore clearly sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3077  Respondent: 15315009 / Edward Dennis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy II)

There is too much traffic in our villages already and this plan will cause more congestion in Ripley, Send and Clandon, with no plan to improve that.

The rural roads in this area are narrow, in poor condition and have no footpaths. 5000 more houses means dangerous and unsustainable traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3083  Respondent: 15315009 / Edward Dennis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the lack of proper infrastructure planning for sites (Policy I1)

The Plan does not identify adequate infrastructure improvements to support the huge scale of development, especially at Garlick’s Arch (A43) which has no infrastructure projects in the Infrastructure Schedule to support it. Local services, utilities and sewerage, doctors etc. are at or close to capacity.

There are no plans to improve the capability of the medical and police/emergency services to cover the 5000+ houses in the north east of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3084  Respondent: 15315009 / Edward Dennis  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

1. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

The A3 or M25 would have to be improved before any development is done. Highways England has no plans to even start considering improving the A3 before 2020. Clearly no real improvements are possible in the timeframe of this Plan so the developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), should not take place.

I wish these objections to be fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3081  Respondent: 15315009 / Edward Dennis  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to poor air quality concerns (Policy I3)

The huge developments being proposed, particularly in the north east of the borough will lead to considerable further congestion and to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3076  Respondent: 15315009 / Edward Dennis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick’s Arch (A43).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3078  Respondent: 15315009 / Edward Dennis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to development in areas which are at risk of flooding (Policy P4)

The Plan does not take adequate account of flood risk as required by National Planning Policy.

The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2016).
These are my main reasons/ I object on these grounds / …

1. I object to the Local Plan as the development proposed is not sustainable

13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve the infrastructure for Garlick’s Arch.

The development should be in urban areas where there is sustainable transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.
The Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing.

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to the 2016 Draft local plan in particular how it will affect the residents of Burpham with the Gosden Hill Farm development.

Here are my thoughts:

Why is G.B.C not objecting to the numbers of houses expected to be built by central government as other local areas have done.

The planned development on Gosden Hill Farm will double the number of houses already in the whole of Burpham.

The traffic is already at a standstill served time a day in Burpham without all the extra traffic problems around Guildford and how to solve them.

There has been insufficient thought given to issues of road infrastructure, schools, doctors and the extra input on the already overstretched Royal Surrey Hospital.

I also object to this being built on Green Belt and it will take away the buffer between us and neighbouring villages. This is a loss of the countryside which you promised to protect.

Can the utilities, drainage, water, electricity etc be sustained on such a large development.

Overall this plan has not been thought out thoroughly and I completely reject it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Dear Council members,

I have lived in Normandy for thirty years, it is a lovely village community and the fact that it is surrounded by green belt has kept the people close and friendly with each other, it is in other words a typical English village, with a village school, doctors and village hall. The roads are narrow and twisty and classified as lanes with pavements mostly only on one side of the lane.

Your proposed plans, to drop into the centre of the village a "small town", doubling the size of the village with over a thousand houses and a fifteen hundred pupil secondary school have absolutely shocked and horrified the people of Normandy.

The proposed site A46 is classified as green belt and the effects such a development would have on the village are catastrophic. The roads are struggling to cope with rush hour traffic now and both junctions onto the A323 are often congested and prone to minor accidents. The increased volume into such a tiny area would have a huge impact on the lives and environment of everyone in the village. The need for a secondary school has not been proven with plenty of available spaces in other schools in the surrounding area and the impact on these existing schools, reducing their intake of pupils and therefore funding, would have a very detrimental knock on effect.

This plan for Normandy is madness, and we wish you to reject it,

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I strongly object to send village being removed from the Green Belt. I object to all building in Tannery Lane it is far too narrow.

I object 40 houses and travellers pitch at Send Hill, I object to all building in our green and pleasant village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The draft plan indicates that West and East Horsley are to be removed from the Green Belt. This is a throwback to the 1940s when there was a plan to urbanise the villages and build a new town - the final decision to build at Crawley saved the Horsleys.

The current plans seem to indicate that 385 new homes would be built in West Horsley and a further 100 on the plot A39. I understand that East Horsley will have an additional 148 homes built.

I do not believe the roads, parking, drainage and schools will be able to cope. Should just 100 of the proposed new homeowners in the Horsleys wish to commute then the station car parks at Horsley and at Effingham Junction will not have the capacity - at present they are virtually full by 9.00am.

There must be some building but ideally for the benefit of the local community, be they properties for starter homes or for the elderly to downsize. We do not need a further influx of residents from London - particularly with the parking capacity at the stations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1430  Respondent: 15315233 / Andree Grimshaw  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A43. I OBJECT to Garlick's Arch being built on.

This is greenbelt land and will be completely destroyed if there are 400 houses and industrial and warehousing developments built there. There is no exceptional circumstances to build on this land. There is no need for industrial developments in Send, build at Slyfield where one already exists. Trees cannot be replaced quickly and act a noise barrier to the A3. There is also not enough Secondary Schools in the area to cater for that many extra people. Additionally, there are no buses or trains to prevent anybody locally having a car at commuting times, you cannot even get back from Woking Station long after 7pm!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1431  Respondent: 15315233 / Andree Grimshaw  Agent:
Policy A44. I OBJECT to building on this land as it is Green Belt.


"Inappropriate development is harmful to the Green Belt and should not be approved, except in very special circumstances." There is no exceptional circumstances here, there is plenty of land available at Slyfield which is not green belt.

Please can all of the above comments be passed to the inspector.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Policy P2. I OBJECT Send should not be removed from the Green Belt


Is states as follows:

"The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence."

Guildford Borough Council is ignoring this wish by the government, given it is a Conservative Council I feel this is showing further disagreement within the Conservative party not required at such time, while also ignoring the wishes of local residents.

I also note that Areas of Outstanding Natural Beauty are ignored for building on, yet Green Belt is, both should be protected or destroyed, that is discriminating against the hidden beauty of the Send area which must be protected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty

- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt

- increase tailbacks on the A31 and traffic congestion

- result in rat-running through local roads

- add to Guildford pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1438  Respondent: 15320641 / G.M & D.J Elvidge  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As a detailed point connected to 3) above, we strongly object to the proposed development of Blackwell Farm would exacerbate the pre-existing congestion at peak times of the A31 and the A3, and would place unbearable pressure upon the B3000, which is already over-used for a B road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3954  Respondent: 15320641 / G.M & D.J Elvidge  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
• result in rat-running through local roads
• add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3092  Respondent: 15320641 / G.M & D.J Elvidge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Firstly, as a matter of principle, the Green Belt was intended to protect existing built up areas from encroachment. If pieces are to be taken from it for further building, then there will eventually be no Green Belt left to be encroached upon. Before building plans are even considered a political decision needs to be made as to whether or not we should have Green Belts at all.

An area protected by a Green Belt is totally different from an area which is not so protected. People have moved into this area precisely because it is protected by a Green Belt. If the Green Belt is diminished in any way, then existing residents will have been robbed of a vital property right.

Property rights are an essential part of the Rule of Law. As such they are a political matter, and their diminution is a matter for a political decision. They cannot be taken away as part of some bureaucratic building plan. If the Green Belt is to be diminished, then we need a political decision as to what exactly are the status of Green Belts, and how much, if any, reliance can be placed upon them by the people of this country.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3090  Respondent: 15320641 / G.M & D.J Elvidge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
• Guildford is planning to build nearly 14000 houses (25%) many more than Woking, Waverley or surrounding boroughs. We feel that the number proposed is far too high. We feel that for Guildford expansion of 25% over the coming years is unrealistic, and we wonder what is driving this expansion.
• We note that 64% of the land to be used for this expansion is to come from the Green Belt and from agricultural land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3094  Respondent: 15320641 / G.M & D.J Elvidge  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The proposed diminution of agricultural land raises similar issues. As I understand it, our country only produces 54% of its food, the rest being imported. There is nothing so important to a population than the security of its food supply, so that this is a political issue of the first importance.

We should make a political decision as to the sources of our food, and what part of it should be locally produced. That should be decided first, before there is any diminution in available agricultural land. It should not be decided upon as part of a building plan, driven by bureaucrats.

3) The areas designated in the plan for building purposes are areas of outstanding natural beauty, including ancient woodlands and heritage sites. Our country has already been more than sufficiently vandalised during the industrial revolution and afterwards. A halt must be called sometime, or else the entire country will be smothered in buildings. On those grounds alone we oppose this plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3099  Respondent: 15320641 / G.M & D.J Elvidge  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
3) Air quality would obviously be adversely affected by the massive increase in traffic which would follow the implementation of this plan. Air pollution is already over the legal limits at the A3 end of Compton.

4) Brownfield sites should clearly be used in priority to Green Belt land. In this context it is surprising that 30% of brownfield sites are devoted in the plan to retail as retail is now being diminished by the Internet. The council should think again.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I agree that more affordable housing is required all around the Surrey area, however Send has been disproportionately targeted and will result in the destruction of a village and the surrounding Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2147  Respondent: 15320673 / Rosie Beauvais  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy A43 change at Garlicks Arch for the following:

The proposal to build 400 new homes will result in excessive traffic throughout the Send & Ripley roads which are already overcrowded. The residents of these 400 homes will require amenities in the local area such as doctors & dentists surgery which are currently struggling to keep up with current demand. A doctors appointment can take up to a week to secure.

The proposal for travelling showpeople plots has increased since the last plans and there is no evidence any plots are required in the Send area.

The Green Belt and woodland around Garlicks Arch is irreplaceable, loss of it will result in the joining up of the villages of Ripley & Send defeating one of the key purposes of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2178  Respondent: 15320673 / Rosie Beauvais  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to policy A58 at Burnt Common for the following:

This proposal was removed from the 2014 planning draft because of the objections made at the time.

Sadly it has returned and has changed from a 'maximum' of 7000sq m to a 'minimum' of 7000sq m, there are empty sites on the established Slyfield Industrial site which surely support the evidence that there is a decline in the demand for industrial land.

If the new site is built once again the resulting traffic will cause unacceptable levels of gridlock which will increase pollution and noise.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3456  Respondent: 15320737 / Steven Brown  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object to POLICY D1 - Making better places

• There is no reference to vernacular or historic design guidelines, even in Conservation Areas. Most of the borough, especially the rural areas, has vernacular design guidelines that are available to give suggestions as to appropriate design. These should have mandatory planning force.
• The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3457  Respondent: 15320737 / Steven Brown  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
I object to POLICY D2 - Sustainable design, construction and energy

- Targets unachievable if Green Belt covered with amount of housing as proposed, causing traffic chaos, infrastructure failure and unacceptable levels of pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/3458</th>
<th>Respondent: 15320737 / Steven Brown</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY D3 - Historic environment

- Supports overdevelopment: you can’t “enhance” history. Doesn’t ban private interests from trying to make aggressive profits from privatising and commercialising public historic assets.
- Doesn’t ban development near historic assets.
- Development close to historical assets is harmful and should be expressly prohibited. Fails to meet the requirements of NPPF 126, 131, 132, 133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY D4 - Development in urban areas and inset villages

- No commitment to expand social housing or accommodation for people who can’t afford so-called affordable homes.
- Not enough new homes in urban areas, despite demand and need for urban regeneration and protection of Green Belt.
- Objectives for inset villages cancelled out by plans for excessive housing growth there.
- Too much emphasis on traditional shops, when a lot of this sector is in terminal decline.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3444  Respondent: 15320737 / Steven Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY E1 - Meeting employment needs

- The evidence base is unreliable;
- There is unclear differentiation between B class uses;
- Only high value-added business uses, contributing to a modern “knowledge economy”, are desirable, not low-grade, low-employment warehousing which is also land hungry;
- Industrial and commercial businesses must be concentrated in the urban area or existing business parks (e.g. Slyfield) not in the rural environment which the infrastructure is unable to support;
- The rural environment must support micro- or high-tech businesses, agricultural industries, and tourism, and these sectors must not be damaged by general industrial development which is inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3445  Respondent: 15320737 / Steven Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY E2 - Location for new employment floorspace

- It would be more sensible to confine all new office and research and development (use Class B1a and B1b) floor space to Guildford town centre.
- I oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to POLICY E3 - Maintaining employment capacity and improving employment floorspace

- Puts unnecessary obstacles in the way of using brownfield land into useful residential housing, contrary to government policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to POLICY E4 - Surrey Research Park

- Subordinates public planning policy to the University of Surrey’s private, commercial enterprises (not its public academic purpose).
- No cost/benefit analysis of harm to Green Belt involved in extending research park.
- Waters down research purpose of park, turning into a general business park.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy E5</td>
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</table>
I object to POLICY E5 - Rural economy

- Incompatible with high housing numbers proposed for rural areas elsewhere in the plan.
- Insetting and settlement boundary extension endanger appropriate rural activities listed that depend on maintaining rural areas’ character.
- Town-centre uses for rural areas contradict government’s localism policy and need to consult and protect village environments.
- Established commitments to high-speed rural broadband and mobile coverage watered down despite 2014 consultation responses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to POLICY E6 - The leisure and visitor experience

- Danger of overdevelopment: success doesn’t depend on building “attractions” which can harm heritage and rural settings. No case made for creating new ones.
- No policy of opposing reduction in rural hotel capacity.
- No definition of what added value interventions by Council can make to normal visitor market mechanisms.
- No policy of supporting Guildford countryside as its prime leisure and visitor asset, whose value rises as London gets bigger and busier.
- No vision of what the ideal visitor experience of the borough actually is and how to support its various elements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY E7 Guildford Town Centre

- No statement in policy wording of value of Guildford’s rural setting and views.
- No consideration of Town Centre Master Plan, GVG proposals or station redevelopment plans.
- Proportion of new housing in town far too small. Development pushed into countryside, ruining the latter and harming urban regeneration.
- No brownfield register.
- Too much big retail, despite online shopping revolution and decline of traditional high streets internationally. Futile to try to turn Guildford into Woking or Kingston.
- No measures to support small, niche retailers in town, e.g. through business rates.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3454  Respondent: 15320737 / Steven Brown  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY E8 - District centres

- Too much scope to expand rural retail centres to justify major housing expansion across the countryside, despite lack of demand. Will spoil character of villages while harming Guildford’s role as a retail hub.
- No measures to support existing rural shops and services, e.g. through business rates.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3455  Respondent: 15320737 / Steven Brown  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to POLICY E9 - Local centres

• No need for retail development “adjacent” to rural centres for same reason as Policy E8.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3429  Respondent: 15320737 / Steven Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object to POLICY H1 – Homes for all

• The policy doesn’t set any constraints on building.
• Housing mix based on growth and demographic assumptions and unreliable SHMA that weren’t put out to formal public consultation and wasn’t scrutinised by Councillors.
• I support higher density development in the urban area
• Fails to compel University of Surrey to use its thousands of planning permissions and existing space, such as car parks, for student accommodation.
• Lets University off the hook of accommodating all its students, so as to free up houses for the most needy in town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3430  Respondent: 15320737 / Steven Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object to POLICY H2 – Affordable homes

• Using the official definition of Affordable is not appropriate. ‘Affordable homes’ in this area are not affordable! Pushing for these homes just means pushing for more development.
• The viability clause lets developers off the hook of providing even these (non-) affordable homes. It is too open to manipulation.
• Contradicts government policy to develop less advantaged regions of the UK. People don’t have to live and work in Guildford but should be encouraged to move to cheaper, less congested areas.
• This policy won’t affect market forces or house prices. Guildford is too small and too near London to influence these, however many homes it builds.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3432  Respondent: 15320737 / Steven Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY H3 – Rural Exception Homes

• It loosens the criteria by allowing “market housing” and development that changes the housing mix. Developers would be able to override NPPF “exceptional circumstances” and other restrictions to build large houses in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3460  Respondent: 15320737 / Steven Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy I4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY I4 Green and blue infrastructure

• Infrastructure considered here as an afterthought, rather than pre-condition of development. Should be a key issue for the rest of the plan.
• Excessive housebuilding in countryside not supported by any funding or provision for infrastructure.
• Heavy focus on building on greenfield sites inefficient and unnecessary: cheap for developers but much more expensive for the public who have to fund the infrastructure.
• Draft CIL scale discourages use of brownfield land first.
• No plan for organic increase in existing traffic congestion, let alone once thousands of houses are built across the countryside. Local roads hardly considered. Green Belt being eroded before road widening/improvement plans certain, encouraging over-development of greenfield sites.
• All Green Belt sites should be removed from the plan until “exceptional circumstances” for development are proven, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3434  Respondent: 15320737 / Steven Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY P1 – Surrey Hills Area of Outstanding Natural Beauty

• This policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. The latter welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3436  Respondent: 15320737 / Steven Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY P2 – Green Belt

• No declaration of support for protecting the Guildford Green Belt, contrary to NPPF and government statements.
• No evaluation of value of local Green Belt as a public and private asset: it’s just treated as potential building land with a few inconvenient restrictions.
• Impact of Green Belt development on local agriculture ignored.
• Impact on rural leisure and tourism ignored.
• Impact on flood control ignored.
• Impact on carbon sink and knock-on effects for air pollution and climate change ignored.
• Impact on biodiversity ignored.
• Impact on natural heritage ignored.
• Impact on water catchment ignored.
• Impact on room for public space amenities (parks, cemeteries, waste facilities etc) ignored.
• Impact on rural business (e.g. mineral mining, film making) ignored.
• Impact on natural landmarks and views ignored.
• Harm to public health and wellbeing (physical, psychological) ignored.
• Allows excessive levels of development in breach of views expressed in last consultation and Conservative Party manifesto commitments at the last local elections.
• Has allowed ruling Councillors to argue that there is an acceptable percentage of Green Belt that should be sacrificed to development, when no such rule exists in the NPPF.
• Ignores alternative approaches, such as fair burden-sharing under which settlements would undertake to accommodate new development in proportion to their size.
• Disproportionate amount of development (most of it, in fact) to be in Green Belt. Too few new homes in urban areas where most people (especially the young and less privileged) want to live. This will act against much needed urban regeneration.
• “Insetting” of most villages disproportionate and unjustified in terms of their contribution under the NPPF to the purposes of the Green Belt. Based on flawed Green Belt and Countryside Study. Idea that most Guildford villages do not contribute to “openness” is subjective.
• Major settlement extensions allow indiscriminate housebuilding, as irregularly shaped villages are squared off to enclose green fields.
• Overall harm to Guildford Green Belt unjustified by any objective development need post-Brexit.
• Ignores most of NPPF 17 stipulations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3438  Respondent: 15320737 / Steven Brown  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY P3 – Countryside (i.e. beyond the Green Belt)

• Gives Ash and Tongham more protection than rest of borough, including existing Green Belt. But they don’t contribute to preventing London sprawl.
• Special treatment of ward represented by current Council Leader and his predecessor. Politically biased.
• A minor extension of Green Belt in one place does not justify its major destruction elsewhere (the inset villages).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3440  Respondent: 15320737 / Steven Brown  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY P4 – Flood risk and water source protection zones

• Inappropriately limits development of urban, brownfield, hardstanding sites, pushing development unnecessarily into the countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3442  Respondent: 15320737 / Steven Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY P5 - Thames Basin Heath Special Protection Areas

• Compensation mechanism too feeble to provide protection.
• Cynical encouragement of SANG to justify nearby development in protected areas. Does not extend protection or amount of green space, and can damage them (e.g. dog and cat attacks on wildlife).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3426  Respondent: 15320737 / Steven Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Please confirm that you have received this response.

I object particularly to the proposed development at Garlick’s Arch and Gosden Hill Farm. The developments are out of proportion to the surrounding area and do not qualify for exceptional circumstances required to take them out of the Green Belt. In addition, I object to the planning policies as follows.

I object to POLICY S1 – Presumption in favour of sustainable development

- No definition of sustainable development given, no reference to its importance in the NPPF, no guidelines for applying it to planning.
- No mention of Green Belt, Guildford’s greatest legacy by far to Sustainable Development. No commitment to protecting it.
- No statement of how economic, social and environmental impacts should be balanced.
- No reference to most of the NPPF Core Planning Principles.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3427  Respondent: 15320737 / Steven Brown Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object to POLICY S2 – Borough Wide Strategy

- No justification given for 13,860 housing need figure. Figure based on a secret formula used by consultants and never seen by anyone on the Council or by the public. Council has failed to seek its disclosure.
- 13,860 figure confuses the OAN with a housing target. No definite housing target given, leaving too much scope for the Council to make one up. I can’t understand how we’re being consulted when we don’t know how many houses the Council want to build, taking all the constraints into account.
- Figures based on a Housing Market Area that ignores 2 neighbouring districts (Rushmoor and Mole Valley) and is much too small, since most people commute or travel far outside the Area to shop or study. This distorts the figures: no reason why Guildford needs to build nearly twice as many large housing estates as the rest of Surrey put together, or half of all sites over 100 units.
- High numbers involved would transform the character of the borough from mainly rural/Green Belt to urban, creating a corridor of development out of London as per Woking or Croydon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3534  Respondent: 15320737 / Steven Brown Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to Policy A42 change at Clockbarn in Tannery Lane - now 60 homes instead of 45</td>
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<tr>
<td>The Village of Send is on Green Belt Land and therefore should only be built on in exceptional circumstances Traffic is already a problem around Tannery Lane and the increase in houses will make it worse</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to Policy A43 change at Garlick's Arch - now 400 homes and 6 travelling showpeople plots</td>
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<tr>
<td>There is no proof of the need for Travelling Show people plots in this location The Village of Send is on Green Belt Land and therefore should only be built on in exceptional circumstances. This development stops the green belt achieving one of its purposes to prevent urban sprawl and the increase in houses would represent over-development of our villages</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Attached documents:</td>
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</table>
I object to Policy A58 change at Burnt Common - now a minimum of 7,000 sq m of industrial or warehousing

The word 'minimum' has been changed from 'maximum' in the 2016 plan. There are more appropriate alternative locations rather than using green belt land for industrial and warehouse development. The impact on local roads from increased traffic will be huge.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1740  Respondent: 15320737 / Steven Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Green Belt, Policy 2 paragraph 4.3.15 - Send Business Park now taken out of the Green Belt.

Taking Send Business Park out of the Green Belt would detract from the openness of the Green Belt and is inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3101  Respondent: 15320769 / Emily Case  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to register my objection to your intention to remove 'Green Belt' protection from the villages within the Guildford Borough Council area.

It is well documented that the infrastructure of the area is under considerable strain and that unrestricted housing development of the area is not sustainable.

I therefore object to your 2016 Local Plan proposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Comment ID: PSLPA16/938</th>
<th>Respondent: 15320801 / J.A Sayers</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object to new sites (Garlicks Arch) being introduced as an after thought when it was not even considered in the previous plan. A slip road on the A3 at Burnt Common has been added to the Draft Local Plan without Highways England consent.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object to a totally unrealistic number of houses for the country lanes to absorb.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td><strong>Attached documents:</strong></td>
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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey Cow1ty Council highway planners' views, or the costs involved in improving the infrastructure, currently out side their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

I object to the 2016 Draft Local Plan as it has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/940  Respondent: 15321153 / Debbie Hustings  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Chilworth

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have viewed the new proposals under the GBC local plan 2016 and I am writing to object to the removal of Chilworth Village from the Green Belt.

Although I appreciate the council is under pressure to find new land to accommodate further housing I believe there is plenty of brown field sites still available to develop.

The loss of green belt status will make a materialistic difference to the Village of Chilworth which has successfully accommodated new developments at Haywards Corner and Titan Sheds.

I'm am particularly concerned about the potential to develop the fields at the end of Manor Lane. This site lacks adequate access and all previous plans have tried to accommodate an unacceptable high level of housing which will impact negatively on this local beauty spot not least the historic Meadows Cottage.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1046  Respondent: 15321217 / Sally Rule  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed Infrastructure Schedule (Appendix C)

There is no schedule for Garlicks Arch (A43) so, the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPA16/1045 | Respondent: | 15321217 / Sally Rule | Agent: |
|-------------|--------------|-------------|-----------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the figure of 693 houses per annum in the borough being too high (Appendix D)

How did you get to this number and is there a report to validate this?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPS16/1577 | Respondent: | 15321217 / Sally Rule | Agent: |
|-------------|--------------|-------------|-----------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Policy A43 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of the land at Garlicks Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlicks arch is Green Belt and has ancient woodland and has a thriving wildlife habitat, which should be protected. There is no infrastructure, it floods and where are the plans to improve local schools, public transport and medical facilities?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPS16/1576  Respondent: 15321217 / Sally Rule  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)
This is disastrous as the increased volume of traffic would impact the local communities. The increased traffic from London (M25) to Woking would go through Burnt Common, Send and Old Woking, which currently cannot cope with the existing traffic. This is unsustainable

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3514  Respondent: 15321217 / Sally Rule  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)
Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3516  Respondent: 15321217 / Sally Rule  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the employment strategy and impact on Garlicks Arch (A43) (Policies E2 and E5)

The development will result in the loss sustainable existing successful businesses, which have been employing local people over many decade

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3510  Respondent: 15321217 / Sally Rule  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

This will cause more congestion to the villages of Ripley, Send and Clandon, which have poor condition narrow roads and no footpaths, which are dangerous. More houses will increase this danger and unsustainable volumes of traffic

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3517  Respondent: 15321217 / Sally Rule  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the lack of proper infrastructure planning for sites (Policy I1)

The current and existing services are over-stretched now, so where are the infrastructure improvements to support the enormous proposed developments, including medical, public transport, schools?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3518  Respondent: 15321217 / Sally Rule  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the congestion that development will cause to the trunk roads A3/M25 (Policy 12)

Realistically and ideally, both the A3 and M25 need improvements before any developments commence and with Highways England not considering improving A3 before 2020, this clearly identifies the proposed developments at Wisley Airfield (A35), Garlicks Arch (A43) and Gosden Hill (A25) as not taking place and proceeding.

I trust that you will take my points into consideration as this is so important to me and to many, many other local people who enjoy living in our beautiful Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/3515  Respondent: 15321217 / Sally Rule  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to poor air quality concerns (Policy 13)

The increased congestion that will arise from the massive proposed developments will in turn lead to increased air pollution which will have damaging effect on local residents and their health

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/3508  Respondent: 15321217 / Sally Rule  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3511  Respondent: 15321217 / Sally Rule  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to development in areas at risk of flooding (Policy P4)

The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Councils’ own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3507  Respondent: 15321217 / Sally Rule  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the 2016 draft local plan for the following reasons:

I moved into this area over 30 years ago because I wanted and chose to live in a proper village, with a thriving and sharing community and as I enjoy walking and spending time in nature, I chose this area for its green spaces and woodland.

Since I have lived in the area, the traffic and congestion has increased, the school places have decreased, properties have been built in any spaces that can be found, there is a lack of parking, waiting time to see the local Doctor has increased, and pollution has increased.

The limited consultation period was shocking. Do you really think ‘we’ the public, tax-payers realise what you are doing? Transparency is honesty …and we deserve that.

With all the plans to build and therefore inviting more people to live ‘cheek by jowl’ in the local Green Belt, in massive developments, do you really think this will not impact our existing over-stretched infrastructure? Do you think that your new plans will be enough? They are not enough now, so, how do you think you can compensate and provide enough for everyone?

I object to the local plan as the development proposed is not sustainable (Policy S1)

The numbers of proposed housing will damage local communities especially Ripley, Send and Clandon. People drive cars as the bus service is limited and Clandon is the only village with a railway station. Where is the important infrastructure in the plan – perhaps building in urban areas would be more beneficial as they already have better infrastructure?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3513  Respondent: 15321217 / Sally Rule  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Borough Wide Strategy (Policy S2)

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. Is this fair and reasonable?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1440  Respondent: 15321249 / Ian Nicholson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am sure you have received many e-mails expressing opposition to the above proposed development based on many different reasons. Some simply based on objection to building on Greenbelt land, perhaps some simply saying little more than “not in my back yard”. I can understand those sentiments but I also understand the need for new housing and that building on Greenbelt land might ultimately prove necessary in some locations where exceptional circumstances prevail. However, I do not believe that there are any exceptional circumstances in this case that would justify building on this particular area of Greenbelt land and there are very real and serious reasons why the area is not suitable for a major development, regardless of whether it is Greenbelt or not.

Firstly the local infrastructure is just not suitable to support the comings and goings of 1100 more households and in addition to that the movements of the many people needing to access the proposed secondary school. Glaziers Lane and Westwood Lane (note that the clue is in the names – Lane not Road) are unable to support the amount of traffic that the new development would generate. Both have significant restrictions in the form of the railway bridges and were never intended to handle the levels of traffic that would be generated. The junctions of both Lanes with the A323 Guildford Road would also be choke points and are far from the safest road junctions in the area. I believe an increase in accident rates at those junctions would be inevitable. Also the local roads leading to the Lanes are already easily congested so it is extremely likely that traffic chaos would extend well beyond Normandy and Flexford, especially at peak times. This is already demonstrated when there is any kind of restriction on the A31. It only takes a relatively small number of vehicles to divert through Normandy and Flexford from the A31 for Glaziers Lane and Flexford Lane to become gridlocked.

Another issue of major concern is the sewer system and drainage. It is already known that the sewer system can barely cope now. Some residents already experience sewage back flow at times. If a new development of 1100 homes plus a school is linked in the existing system it is difficult to see how it could cope. Improvements would have to be made to the system extending way beyond the boundaries of Normandy and Flexford. Is that actually practicable? I don’t think so. The whole area has a very high water table and during the winter especially localised flooding is common. My property, [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998.], and the neighbouring properties which back on to the proposed development site suffer from significant amounts of laying water in the winter time, a situation that prevails for weeks at a time, not just a few occasional days. Other areas, including the train station car park suffer similar problems. If the fields between Glaziers and Westwood Lanes are built over, given the poor drainage available, the run off from that area could cause even bigger problems. Worse flooding could be the result and, I believe, even subsidence. We already see noticeable surface movement here when the ground becomes waterlogged in the winter.

I do not believe that these issues have even been considered by GBC when proposing this development and would need thorough investigation before any significant development could take place.

The effect on local wildlife cannot be ignored. I believe it would be devastating and unjustifiable. I am sure that there are many others better informed on this than I am and will provide greater detail but I understand that this site is only about 800m from the Thames Basin Heath Special Protection Area and so is within the 400m – 5km zone of protection.

It seems to me that this proposal is being put forward by Taylor Wimpey purely in the interest of financial gain and without any thought for the existing community and the problems it would cause. GBC have included this proposed large development in the plan along with some other larger sites as it is easier and more convenient for the Council to administer a small number of large sites and developers than a higher number of smaller sites. and developers. That is actually by the Council’s own admission. In doing so the Council simply has not properly considered the impact of these sites on the local communities and completely ignored other suitable sites such as the one off the Epsom Road at West Horsley. The promise to provide a new school to justify site A46 will be seen by many, including me, as a rather cynical attempt to push through permission to build on Greenbelt land that would otherwise remain protected and beyond a developer’s grasp. From information that I have received, and I believe it has been drawn to your attention in more detail by others as well, all of the schools in the surrounding area are significantly under subscribed at the moment (including schools in neighbouring
boroughs that are willing to accept pupils from surrounding boroughs), with even more school places still to be added. It is, therefore, difficult to see how the provision of another completely new school in Normandy/Flexford is required. Even if such a school was required the Normandy/Flexford site would not be suitable. That in addition to another 1100 homes would have a devastating effect on the area and its residents. In fact both kings Manor and Ash Grange schools have the ability and willingness to expand should there be a demand for more school places in the area. Surely that option would be far more cost effective than building and then having to equip and provide staff for a completely new school in such close proximity. It seems to me the provision of a school on site A46 simply cannot be justified.

I wish to register my strong opposition to the GBC plan and in particular the proposed A46 Normandy/Flexford site. We all appreciate the need to provide more housing and I’m sure most of the residents of Normandy and Flexford are happy to accept a small amount of properly considered, sustainable development in the area but something on the scale that has been proposed simply isn’t sustainable or acceptable. If the development went ahead not only the existing residents would suffer. The new residents would also suffer exactly the same problems.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I have viewed the new proposals under the GBC local plan 2016 and I am writing to object to the removal of Chilworth Village from the Green Belt.

Although I appreciate the council is under pressure to find new land to accommodate further housing I believe there is plenty of brown field sites still available to develop.

The loss of green belt status will make a materialistic difference to the Village of Chilworth which has successfully accommodated new developments at Haywards Corner and Titan Sheds.

I'm am particularly concerned about the potential to develop the fields at the end of Manor Lane. This site lacks adequate access and parking.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/1441</th>
<th>Respondent: 15321377 / Jeremy Moss</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I understand that the Wisley Airfield site is still considered a strategic part of the GBC local plan and thus under threat of development. There is an undeniable need for more housing in this country. There may be areas in the country where new towns could be created and develop with the areas around them. Within Surrey this is a much more difficult proposition with the crowded and developed nature of the county. I particularly object to the idea that GBC can offload the difficulties of integrating a new small town, by building it adjacent to another borough that will receive all the problems of several thousand new inhabitants and their cars.

I regularly use the small narrow roads around the Wisley Airfield area. I also use Cobham town centre and Cobham station car park. If Wisley is developed Cobham will become the natural focal point for shopping and commuting to the significant detriment of residents. GBC will have achieved development goals with no impact to GBC residents as the impact has been offloaded on the geographically nearest town. With a crowded area it does seem more sensible to have many small areas of development dotted around where a few extra houses do not stress local amenities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
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<tr>
<th>Comment ID: PSLPA16/943</th>
<th>Respondent: 15321409 / Claire Stammers</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Chilworth</td>
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</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I feel very strongly Chilworth should remain in the green belt. This status being lost would increase development in the village. During school drop off/pick up time the village is flooded with traffic, cars parked excessively along the roads and Tillingbourne school area is especially bad. Any future building development would hamper this even more with most houses having at least two vehicles as public transport in these rural parts is poor.

In addition to this, the main exit from Chilworth at Rices corner is grid locked morning and evening, many accidents have also happened here over the last few years.

I feel very strongly Chilworth should remain in the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/946  Respondent: 15321473 / Harriet Romer-Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to register my concern regarding the above. I grew up in Long Reach and still visit the area regularly with my family. Having discussed this proposal with my father I believe it would be very detrimental to the area in terms of infrastructure and services.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/947  Respondent: 15321537 / Matthew Hustings  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Chilworth

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am writing to object to the removal of Chilworth Village from the Green Belt.

I believe there to be plenty of brown field sites still available to develop.

I cannot see how the current infrastructure can possibly accommodate such a development.

To have World Heritage status is something to be proud of, and it would be a great pity to spoil this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the lack of immediate provision for new schools.

I object to the lack of the immediate provision of Doctors surgeries

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3112  Respondent: 15321729 / Fiona Keywood  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object strong to the 2016 New Local Draft Plan.

I object to the erosion of the Green Belt.

I object to the insetting of any villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3113  Respondent: 15321729 / Fiona Keywood  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the disproportionate amount of development in one area of the Borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/669  Respondent: 15321729 / Fiona Keywood  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of any evidence for the alleged housing numbers

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/668  Respondent: 15321729 / Fiona Keywood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the limited consultation period.

I object to the last minute inclusion of new sites with less than 2 weeks notice

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/950  Respondent: 15321985 / Theo Keywood  Agent: Colin Keywood

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of immediate provision for new schools.

I object to the lack of the immediate provision of Doctors surgeries

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/3114  Respondent: 15321985 / Theo Keywood  Agent: Colin Keywood

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object strong to the 2016 New Local Draft Plan.
I object to the erosion of the Green Belt.
I object to the insetting of any villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3115  Respondent: 15321985 / Theo Keywood  Agent: Colin Keywood

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the disproportionate amount of development in one area of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/671  Respondent: 15321985 / Theo Keywood  Agent: Colin Keywood

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the lack of any evidence for the alleged housing numbers

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/670  Respondent: 15321985 / Theo Keywood  Agent: Colin Keywood
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the limited consultation period.
I object to the last minute inclusion of new sites with less than 2 weeks notice

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/962  Respondent: 15322017 / Colin Keywood  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of immediate provision for new schools.
I object to the lack of the immediate provision of Doctors surgeries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/961  Respondent: 15322017 / Colin Keywood  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of any evidence for the alleged housing numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Answer (if comment is on questions 1-7 of the questionnaire): ()

I object strong to the 2016 New Local Draft Plan.

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Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the disproportionate amount of development in one area of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ( )</strong></td>
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<td>The air pollution levels are already unacceptable and I would be annoyed if the GBC should legally sanction new houses being built, let alone a school putting further strain on pollution levels and the physical safety of the occupants.</td>
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<tr>
<td>This area is near the most built up traffic hot spot area in the county. Junction 10 of the M25 is a traffic black spot which has a clear adverse affect on important routes into the city and to two major airports.</td>
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<tr>
<td>The local roads cannot cope safely with the increase if traffic there is no room for lorries cars and cyclists as it is. There have been numerous accidents recently on local roads and the GBC will be sanctionning the dangerous road usage that will lead to deaths of road users.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ( )</strong></td>
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</table>
There is no protection for historic green belt land within easy reach for London. It is so important to protect this agricultural recreational rural countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3136  Respondent: 15322241 / K. Paulson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I finally believe that we are custodians of this green belt land. The decisions you make now will desecrate this beautiful countryside for future generations.

Please listen to what are legitimate and logical concerns and understand how strongly locals feel about this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3131  Respondent: 15322241 / K. Paulson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write to object to the Current GBC local plan and the dramatic detrimental affect this will have on the rural community.

The Guildford planning Department have failed continually to listen to the local community to such a degree that we residents have to question their motives and integrity. The day before they unanimously rejected the former horlsey Airfield, Three Farm Meadows okanning application They were already aware that it was the intention to include the site in the GBC local plan remove its green belt designation. I was appalled at the twice that theu are putting the local residents of ockham thorugh.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/3133  Respondent: 15322241 / K. Paulson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The proposed development of over 5000 houses in total is totally disproportionate to the surrounding area and a density more suited to an inner city.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3135  Respondent: 15322241 / K. Paulson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The developers have failed at every level to engage with the local inhabitants and have shown intent on one thing, which is to make maximum profit.

Are you really going to ignore every single objection and show yourselves to be undemocratic and unable to follow renamed arguments and objections.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3130  Respondent: 15322273 / Alan Dobson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
As a Guildford resident for a long time I have seen all the changes some good some bad but the supposed number of house's being planned is to high, while I agree there is a case for more housing but not the numbers suggested. Traffic is at a standstill most days, hospital is not coping with the numbers now so more residents will not help. This is the second attempt to expand Guildford and not taken in to account residents point of view, all the objections still stand from the previous plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>Comment ID: PSLPP16/3137</th>
<th>Respondent: 15322689 / Lynne Goodfellow</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I am writing to say that I strongly object to the Green Belt status of our area mainly south of the A246 being changed and brought within a newly identified "village boundary"

The purpose of the Green Belt was to protect our beautiful village and its surroundings. We have a responsibility to keep our rural areas open for future generations who are bound to suffer from these proposed changes. Once these appalling changes are put into place, there will be no going back.

We have a duty to protect our very precious village lay out and its countryside.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>Comment ID: PSLPP16/3138</th>
<th>Respondent: 15322689 / Lynne Goodfellow</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I am writing to you to express my strong objection to the fact that the development of Wisley Airfield with 2000 houses under 2 miles from the Horsleys has been included again in the plan.

The A3 road has more traffic than it can cope with already. Our smaller lanes will become congested.

Our local hospitals are already fully stretched.
There will be a need for more doctors, therefore we would need more surgeries.

We have no more space to accommodate at least 2000 more cars in our village.

There would be a desperate need for more schools, but, bearing in mind the congested roads, how would we get to them?

Please do not agree to the plans that will eventually spoil the lives of the present residents, who are justly proud of the village that exist today.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Policy A35 proposes approximately 2,000 homes to be built on the site of the former Wisley Airfield. This will lead to the creation of the largest settlement in Guildford Borough outside of Guildford town. In effect it is proposing to create a New Town in the heart of the Surrey Green Belt.

I have major concerns about this proposed development and have objected to prior planning applications at this location. In addition to the issues raised above relating to Junction 10 of the M25 and the lack of parking at both Horsley and Effingham Junction stations, I consider this proposed development to be a severe contravention of Metropolitan Green Belt policy. It will result in a New Town being created of very low sustainability which will have a major adverse impact on infrastructure across a widespread area, including East Horsley. Above all it will cause irreversible destruction to the character of one of the most picturesque and historic areas of the country.

I strongly OBJECT to Policy A35.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I strongly OBJECT to this proposed policy for the reasons detailed in this letter.

a) The proposed development represents a fundamental breach of Metropolitan Green Belt rules:

The site forms part of the Metropolitan Green Belt. Under the NPPF, development on such Green Belt land is only permitted under 'very special circumstances'. GBC's Planning Officer, in assessing a previous planning application from the developer of this site, rejected their application, arguing that: *It has not been demonstrated that the benefits of the proposal amount to very special circumstances* such as to clearly outweigh the harm to the Green Belt and the other harm identified.

Ministerial guidance has repeatedly confirmed that unfulfilled housing need does not qualify as a very special circumstance. Whilst the developers' previous planning application was judged and rejected based upon the 2003 GBC Local Plan, the proposal to include this site within the 2016 Proposed Submission Local Plan does not fundamentally change the argument against it. Any removal of this site from the Green Belt can only be made based upon 'exceptional circumstances', which cannot be justified on the basis of unfulfilled housing need. If this was the case, then the entire Metropolitan Green Belt would already have become filled with housing.

Removal of this site from the Green Belt is totally against its rules, regulations and underlying spirit. The site location at the edge of the M25 circle represents a 'first line of defence' against metropolitan encroachment into the Surrey countryside. If this site is developed then it becomes only a question of time before Guildford itself is absorbed into the sprawling London conurbation.

Accordingly, I OBJECT to Policy A35 as a fundamental breach of the Metropolitan Green Belt rules.

b) This site does not meet acceptable levels of sustainability:

Sustainability Appraisal is a core concept of planning policy, yet this site is rated very poorly in terms of its sustainability.

The sustainability appraisal undertaken by GBC's consultant, AECOM, is presented in the Local Plan Evidence Base report 'Sustainability Appraisal (SA) of the Guildford Borough Local Plan' issued in June 2016. In their report AECOM have graded all Local Plan policy sites according to 21 different criteria using the conventional 'traffic light' system. Red colouring signifies poor sustainability. Of the six larger sites included in their evaluation, (those with proposed housing numbers of 1000 homes or greater), AECOM rates Site A35 as the very worst of all in terms of its sustainability. No less than 8 out of the 21 criteria are graded as 'Red' by AECOM for this site, more than any other large site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Detailed reasons why this site has such poor sustainability include the following:

- There is currently no infrastructure whatsoever at this site, meaning that all water, electricity, gas and phone services will need to be newly established;
- New large-scale sewage disposal will be needed, a fact recognised by Thames Water, indicating it may take 3+ years to provide adequate sewage handling facilities for this site;
- There are presently no schools, medical services or shops within walking distance of this site;
- There is presently no local employment at this site and little after the development is completed;
- There will be a significant destruction of agricultural land arising from this development; There will be significant environmental damage from this development;
- There is no public transport currently serving this location;
- The nearest train stations are Horsley and Effingham Junction, both around 3 miles away and so too far to walk. Neither station currently has significant parking capacity available.
- Travel from this site will be primarily dependent upon motor vehicles. Any new site so dependent upon motor vehicles for transport cannot be considered as being 'sustainable';
- New access roads will be needed and significant changes proposed to the surrounding road network, leading to further pressure on over-crowded rural roads and increase in the traffic congestion in nearby settlements;

Whilst some of these issues may be mitigated, e.g. by building new schools, medical facilities, etc, others such as the environmental issues and infrastructure impact may not. This proposal, fundamentally, represents an attempt to create a large-scale new settlement in a poorly-sited green field location. However, as the GBC's own consultant has demonstrated, this site does not reach acceptable minimum levels of sustainability.

Accordingly, I OBJECT to Policy A35 on grounds of its unacceptable sustainability.

c) The site will have a severe impact on local traffic & infrastructure:

The proposed development will have a severe adverse impact on road traffic in the surrounding area. This includes East Horsley where high volumes of additional traffic are likely from the residents of this new settlement accessing East Horsley's two stations, shops and nearby schools. Most of the rural roads in this area are narrow winding 'lanes' - a term used in a recent local public meeting by John Furey, senior SCC councillor for Infrastructure to describe East Horsley's through roads. Many of these 'lanes' are without pavements for large stretches, whilst the principal through-roads of Ockham Road South and Forest Road pass along unlit residential areas so narrow that two buses cannot cross in many sections of these 'lanes'.

The road closures and junction changes being proposed to accompany this development will only serve to increase traffic volumes through the village centres of East Horsley, Cobham and Ripley, and around the station at Effingham Junction, all of which already suffer from traffic congestion at peak hours. The further increase in traffic congestion at the A3-M25 intersection would only exacerbate an existing problem for the highways authority - we understand Highways England have repeatedly expressed serious concerns about this development.

Neither Horsley nor Effingham Junction railway stations currently have any significant spare parking capacity. The suggestion of the developer that large numbers of cyclists from Site A35 will cycle 6 or 7 miles each day along busy roads in order to travel there and back to these stations lacks credibility. Other village facilities in East Horsley, such as the medical centre, are also likely to suffer adversely from a substantial increase in users as a result of this proposed development.
Accordingly, I OBJECT to Policy A35 on grounds of its severe impact on local infrastructure.

d) There are damaging health & safety implications arising from development at this site:

The site is located close to the junction of the M25 and A3, one of the busiest road junctions in the country. The Nitrous Oxide (NOx) emissions recorded around this area are extremely high and will affect residents living at the proposed site. The proposal to build new primary and secondary schools at this location is also contrary to government policy prohibiting the building of schools on sites in areas where there is high NOx.

In rejecting the previous planning application by the developers, the GBC Planning Officer cited the "failure to provide adequate information on NOx emissions and nitrogen deposition and to provide any information on acid deposition" as one of the grounds for this rejection.

Accordingly, I OBJECT to Policy A35 on grounds of its adverse health & safety implications.

e) The environmental impact on protected wildlife will be substantial:

GBC's Land Availability Assessment which supports Policy A35 states that the site lies within the 400m-5km 'Zone of Influence' of the Thames Basin Heaths Special Protection Area (SPA). This is not correct. The site is immediately adjacent to Ockham & Wisley Commons, an area designated as a Site of Special Scientific Importance (SSSI), which forms one part of the Thames Basin Heaths SPA and much of the site lies within the 400m Exclusion Zone where new building is effectively prohibited.

The SPA was set up to provide protection for rare and threatened birdlife in certain lowland heath locations, the provisions of which were agreed by GBC in its 'Thames Basin Heaths SPA Avoidance Strategy'.

This strategy establishes zones to protect the SPA from the impact of new development, particularly from the damage caused by pets (dogs, cats, etc) of local residents to the habitats of threatened ground-nesting birds. Land within 400m of the SPA is designated as an 'Exclusion Zone' where "there will be a presumption against additional new dwellings". Since the Wisley Airfield site is immediately adjacent to Ockham Common for a significant length, much of this site falls within 400m of the SPA Exclusion Zone.

The remaining portion of this site falls within the 400m -5km 'Zone of Influence' set out under the SPA policy, which requires developers to contribute a new SANG ('Site of Alternative Natural Greenspace') to mitigate for potential damage caused to the SPA from new development -the size of the SANG is a function of the scale of the development. In their previous planning application the developers proposed that the land within the 400m Exclusion Zone would provide their SANG contribution. If accepted as a SANG, this would only encourage the 5000+ residents of the new settlement to allow their pets access into this space, therefore defeating the objective of the SANG mitigation.

Even with the 400m Exclusion Zone in effect, the positioning of such a large site immediately adjacent to such an important protected space will inevitably have a major detrimental impact on the wildlife within it.

Accordingly, I OBJECT to Policy A35 on grounds of its material adverse environmental impact.

f) The development is totally out of keeping with local character, context & distinctiveness:
It is a key element of planning policy that new developments should be in keeping with the established pattern of development in the area. In the 2016 Proposed Submission Local Plan, GBC's very first housing policy, Policy H1, requires that development should: "make the most efficient use of land whilst responding to local character, context and distinctiveness." However, Policy A35 fails to do this.

With its proposal to build some 2,100 homes on and around the site of the former Wisley Airfield, Policy A35 will create a new settlement larger than any other in Guildford Borough, outside Guildford itself. The nearby historic village of Ockham has merely 159 dwellings. It will be completely swamped by a development on such a scale.

Moreover, the design and density of the proposed development will be completely out of context with its surrounding area. Due to the restrictions of the SPA Exclusion Zone, the need for SANG provision and the land needed for the waste facility, the actual land area to be used for housing development under Policy A35 is estimated to be around 43 hectares. Therefore, with 2,100 homes proposed for this site, the overall housing density of the settlement area may be calculated at around 49 dwellings per hectare (‘dph’).

East Horsley, just three miles from this site, is the largest settlement in Guildford borough outside of Guildford town, with some 1,760 homes. East Horsley presently has an overall housing density of 8.1 dph within its settlement area. Therefore, the proposed development under Policy A35 is six times as dense as the nearest settlement of a comparable size. The proposed development under Policy A35 therefore utterly fails to respond to local context and as such is in breach of GBC’s own Housing Policy H1.

The density of 49 dph proposed under Policy A35 is effectively an urban density appropriate for a metropolitan location. It is to be achieved in part by building apartment blocks of five stories in height, according to the designs previously presented by the developer. For a setting within the middle of rural Surrey this is completely out of character.

Other settlements close to this site are small rural villages such as Ockham, West Horsley and Ripley. These villages have grown up organically over a thousand years. They contain many historic, listed or otherwise protected buildings as well as a range of residential housing, predominantly detached two storey houses or bungalows. They are all picturesque villages with charm and character. Visitors come to the area to enjoy some of the prettiest villages and countryside in southern England, all within easy access of London. The character of this whole area would be irreparably destroyed if this development goes ahead.

Accordingly, I OBJECT to Policy A35 on the grounds that it is out of keeping with local character, context and distinctiveness, and therefore breaches the NPPF and emerging GBC Policy H1.

Concluding remarks

I Have major concerns about Policy A35. I consider this proposed policy to be a severe contravention of Metropolitan Green Belt rules. It will result in a new settlement of very low sustainability, it will have a major adverse impact on the infrastructure and environment across a widespread area and it will cause irreversible destruction to the character of one of the most picturesque and historic areas of the country.

Accordingly, I strongly OBJECT to Policy A35.

In the light of the recent referendum outcome, which will result in the UK leaving the EU, it is inevitable that the population and economic projections for Guildford Borough will need to be reduced.

I presume that GBC will in due course be making such reductions to its proposed housing projections to reflect these changed circumstances. In our opinion, the proposed development at former Wisley Airfield ought to be the very first site in the Borough that GBC should remove from its draft Local Plan as a result of the UK now proceeding to leave the EU.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Comment ID: PSLPS16/1448</th>
<th>Respondent: 15323041 / Jane Doherty</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A36</td>
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<td>Policy A36 proposes to re-develop the current Thatcher's Hotel for housing.</td>
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<td>My principal concern is over the number of houses proposed for this site - approximately 48 dwellings. This number gives an implied gross housing density of 37 dwellings per hectare, which is exceptionally high for this location. The average housing density across the East Horsley Settlement Area is 8.1 dwellings per hectare and the highest density found in any of the roads around this location is 13 dwellings per hectare.</td>
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<td>I would only support development at this location if it has a significantly lower housing density more in keeping with the character of the village.</td>
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<td>Policy A39 proposes a housing development of some 100 dwellings on a 5.7 acre green-field Green Belt site behind the houses on the western side of Ockham Road North. Access is to be secured by demolishing the first two houses next to the railway bridge.</td>
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<td>As discussed earlier, I consider that the proposed western movement of the settlement boundary needed to bring this site within the settlement area is unjustified and contrary to NPPF rules. If this boundary movement is invalid, as we believe, then this site remains a part of the Metropolitan Green Belt. As such and with no ‘very special circumstances’ to justify housing development upon it,</td>
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<td>I OBJECT to Policy A39 to which I would also observe is at a density not in keeping with the village.</td>
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The LAA identifies six sites in West Horsley for potential development, the four largest having allocation policies within the Proposed Submission Local Plan. The total housing number arising from these six sites is 405 homes in total. For a village which had 1,124 dwellings at the 2011 Census, this represents a proportional increase of 36% over the plan period, an enormously high proportion by any standards.

The four policy sites are all located within the Green Belt. One is a partly brownfield development but the other three sites are all open fields used for agriculture and all lie within the current Green Belt at the edge of the Settlement Area. The reasons presented by the consultants, Pegasus, in the Green Belt & Countryside Study to justify these settlement boundary movements appear to me highly questionable and in no way to meet the requirements of the NPPF that such boundary movements are only to be made in 'exceptional circumstances'. These movements clearly represent a deliberate pushing back of settlement boundaries in order to provide more greenfield sites for housing development. As such, I consider these proposed movements in settlement boundaries to be invalid.

These proposals are also contrary to the principles of the Metropolitan Green belt. West Horsley represents one of the first 'lines of defence' against London urban encroachment outside of the M25 circle. Yet these policies will eliminate a significant part of this defence as they seek to expand the boundaries of this village and fill-in every bit of green space within this rural setting.

It is also totally contrary to the opening statement of Local Plan Policy P2 that "We will continue to protect the Metropolitan Green Belt". It seems that in West and East Horsley at least the draft Local Plan is doing exactly the opposite.

Given the scale of the development proposed in West Horsley, the inevitable destruction of its village character and the impact on infrastructure across West and East Horsley, I OBJECT to the site allocation policies A37, A38, A40 and A41.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I support this policy

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3153  Respondent: 15323041 / Jane Doherty  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I support this policy

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3154  Respondent: 15323041 / Jane Doherty  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

East Horsley contains a wide range of heritage assets which make an important contribution to the look and feel of the village and its character. I fully support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3156  Respondent: 15323041 / Jane Doherty  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I support this design policy, although not the proposal of Policy P2 to inset East Horsley from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3150  Respondent: 15323041 / Jane Doherty  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I support the general policy statements made in this policy, whilst having no opinion on the scale of the new office space and industrial land area being proposed by GBC.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3151  Respondent: 15323041 / Jane Doherty  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Under this policy, areas within 500 meters of a "public transport interchange" play a key role.

Proposals for new office and research and development floorspace are to be directed to firstly Guildford town centre and then to areas within 500 meters of a public transport interchange ("PTI").

East Horsley has two railway stations, Horsley Station and Effingham Junction Station, but currently the draft Local Plan only proposes that Horsley Station should have PTI status.
The explanation given at 4.4.17 for Effingham Junction Station ("EJS") not enjoying this status is that either it is located within the Green Belt, or it is within an AONB or it is isolated away from the village or centre. It is not clear which of these applies to this particular station, but we believe strongly that none apply and that there is a strong case for EJS deserving PTI status in the same way as Horsley Station.

I will deal firstly with the three alternative reasons given for EJS not supposedly qualifying as a PTI.

Firstly there is the Green Belt aspect. This is not logical since if location within the Green Belt were determinative, this would mean that Horsley Station would also fail to gain PTI status.

Also the draft Local Plan proposes elsewhere at Policy P2 that the whole of East Horsley, including both Horsley Station and EJS, should be inset from the Green Belt. It will be seen elsewhere in these comments that I object strongly to this proposal, but the point remains that if location within the Green Belt were a valid reason for not being given PTI status, the Local Plan itself makes it clear that under Policy P2 this will not apply in the case of both Horsley Station and EJS.

Secondly EJS is not located in an AONB. EJS is within the envelope of the village settlement and will remain as such under the draft Local Plan.

Thirdly EJS is not "isolated" or "away from the village centre."

Effingham Junction (the area immediately south and west of EJS, served by respectively Forest Road south of the railway bridge and Old Lane) may not have the extensive shopping parades enjoyed by East Horsley's two other centres (Station Parade and Bishopsmead Parade) but it is a thriving community with a significant population and also a significant number of active and successful employment floorspaces and sites.

These include in Forest Road a general store (Forest Road General Store), a car sales and car repair business (PJB Car Sales/The Body Shop), a dental health centre and chiropractic clinic (Mortiboys) and on Horsley Road, Cedar Garden Centre, Royce Turf and Irrigation and at the Newmarsh Farm site, a number of businesses including Richmonds Horse Transport, Braye Hydraulic Repairs and TIS Surfacing Ltd.

It is therefore vital that the Local Plan's economy policies affecting the area protect these spaces and sites and create conditions for their sustainable growth and hence job creation.

Since all or most of these businesses are located within 500 meters of EJS, Policy E2 would be an invaluable driver for such growth which could play a major role in ensuring that Effingham Junction maintained and enhanced its position as East Horsley's "third centre" for homes and jobs. On the other hand, to exclude EJS from PTIstatus could very well stifle its sustainable development and condemn it to a future as a dormitory "backwater" of East Horsley.

It is also counter-intuitive in the extreme to refuse EJS "PTI" status. This is for the simple reason that EJS is clearly a "public transport interchange" as that term would be normally understood. This is for the following reasons:

• as the name "Effingham Junction" indicates, EJS is at an important junction and The railway line from Guildford splits here into two lines which take different routes into London, so many London-bound passengers will change trains here;

EJS serves not only the Effingham Junction area, but also the many residents of Effingham and Little Bookham for whom EJS is far closer than Bookham Station;
- EJS also serves the many residents of the Cobham area for whom EJS is far closer than Cobham and Stoke d'Abernon station EJS also serves the residents of Ockham and Ripley;

- EJS also serves the considerable numbers who visit local leisure activity sites, including three paintball sites and two clay pigeon shooting sites, for whom EJS is the only viable public transport hub; and

- EJS will be the nearest railway station to the land at the former Wisley Airfield site which is proposed for the building of 2000 homes under Policy A35 of the draft Local Plan and if, despite the objections of many including East Horsley Parish Council, this proceeds, then significant numbers of residents will be taking one form of travel to EJS and then interchanging onto the railway.

I accordingly OBJECT to Policy El insofar as it fails to confer "public transport interchange " status on Effingham Junction Station.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3142  Respondent: 15323041 / Jane Doherty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I support the general policy statements made in this policy, my main concerns, as set out previously, are primarily with the scale of new housing being proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3143  Respondent: 15323041 / Jane Doherty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I support the general principle that developers should be required to contribute part of their development profit towards the cost of social housing in the borough. However, this 'one-size-fits-all' policy is seriously flawed and likely to prove highly inefficient, if not unworkable, in the longer term.

In this policy GBC have taken no regard whatsoever of the differences in affordable housing need across the borough. This has significant consequences in East Horsley, which is the area with the lowest demand for affordable housing in the borough. Moreover, East Horsley is not classified as a 'rural area' under the 1997 Housing Order and therefore is not exempt from the new 'right to acquire or enfranchise' entitlement - a factor which is likely to see affordable houses in the parish being bought up as soon as possible and thereafter lost to the affordable sector.

Under Policy H2, 40% of all but the smallest development sites in East Horsley will be required to have affordable housing built upon them, irrespective of whether there is actually demand for more social housing in that area. Moreover, the affordable housing targets proposed in the Proposed Submission Local Plan indicate that the biggest component of affordable housing (40%) should be built as 1-bed dwellings despite the fact that GBC's own studies show that the strongest affordable demand in the borough is actually for larger 3-bed dwellings.

As a result of this flawed affordable housing policy, a significant volume of social housing is likely to be built in places where it is not needed and offered to tenants who do not want to live there nor have jobs near that location. Policy H2 thereby fails the test of sustainability and should be radically revised. If not, the outcome will be serious inefficiency in the provision of social housing in the borough. In an area such as East Horsley this is likely to be manifested in a rapid buying-up of properties for quick re-sale at a generous profit, at which point these homes also become lost to the affordable sector.

I accordingly OBJECT to Policy H2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3144  Respondent: 15323041 / Jane Doherty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3159  Respondent: 15323041 / Jane Doherty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

These three policies cover Infrastructure & Delivery. Whilst we support the general policy statements as presented, it is the detailed infrastructure proposals for Guildford Borough which give me cause for concern.

I believe there are serious deficiencies and shortcomings in the infrastructure of Guildford Borough as it is today and that the aggressive housing policy as proposed by GBC in the Proposed Submission Local Plan will exacerbate this problem.

I would make the following comments specifically about infrastructure in East Horsley today:

- Roads across the parish are in poor condition with many potholes. Many roads are unable to sustain their current levels of traffic, particularly the increasing levels of HGV traffic;

- The principal through roads traversing East Horsley are narrow and winding, have a series of pinch points, have sections without any pavements and are generally bad. As a senior councillor remarked at a recent public meeting in the village hall: "East Horsley has lanes, not roads." East Horsley's 'lanes' are totally unsuitable for high volumes of traffic, in particular for the volume of HGV's now using them;

- Many of the drains are blocked or otherwise in poor condition giving rise to frequent surface water flooding when it rains;

- The pavements are in poor condition as well as being narrow, they are often uneven and/or cracked making it difficult, for example, for people with pushchairs or prams or in wheelchairs;

- There are insufficient school spaces for the number of local children needing them, with the result that children are often allocated to schools a significant distance away such as Darking or Woking; and

- The Medical Centre in East Horsley is already at capacity in terms of its number of beds.

Furthermore, I would observe that the traffic at the A3/M25 Interchange (Junction 10 of the M25) is already at a point where significant delays and congestion occur every morning. My personal experience is that this congestion has worsened significantly over the past few years. Whilst the plan references improvement to this junction, these may ease the current issues, but adding the housing proposed for the Horsleys, Wisley Airfield, Ripley and Send will likely result in no improvement, but rather worsening of an already unacceptable situation.
In respect of East Horsley, there are only two specific proposals in Appendix C:

LRN 25 - East Horsley and West Horsley traffic management and environmental improvement scheme. It is not clear what is proposed here, and its timing and funding have to be considered uncertain. It is stated that funding will, at least in part, come from developer contribution. However, it is not at all clear what development is likely to give rise to such a contribution, but it certainly implies that funding could only come if there were a development; and

HSC 5 - Expansion of East Horsley Medical Centre to provide additional capacity and services for future population in years 5 - 15 of the plan.

There are no proposals in respect of all the existing problems with for example roads, pavements, drainage, and schools. Furthermore, it is inevitable that the proposed developments in East Horsley itself and nearby, particularly in West Horsley and the proposals for Wisley, will put further strain on the existing infrastructure. There are no proposals at all to cater for this.

Although an expansion of the Medical centre is proposed in the Infrastructure Schedule, this is not until years 5 - 15 of the Plan. Given that it is already at capacity, EHPC believes that this needs to be done earlier.

Local primary schooling is also a very pertinent issue. There are 11 housing development sites identified in the LAA for East and West Horsley, which taken together would result in the building of 593 new houses in the two parishes that are today served by a single primary school - The Raleigh, in West Horsley. Planning guidance suggest that this number of new homes will require the provision of around 150 additional primary school places to accommodate such an increase in population. Today there is no spare capacity at The Raleigh, yet no proposals are made in the Proposed Submission Local Plan to provide for any more schooling in the Horsley's.

I believe that the failure to address the inadequacies of the existing infrastructure to meet the needs of what is there already is a serious deficiency in the Proposed Submission Local Plan.

I accordingly OBJECT to the infrastructure proposals on these grounds. I further OBJECT to the proposals for infrastructure in that they do not meet the stated objective of providing infrastructure to support the proposed developments.

POLICY 14 Green and blue infrastructure Isupport this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The Surrey Hills AONB is one of the great treasures of Guildford Borough and we believe that protecting this area should be given the highest priority.

I therefore support Policy P1.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/3146</th>
<th>Respondent: 15323041 / Jane Doherty</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Local Plan Policy P2 states that: *We will continue to protect the Metropolitan Green Belt.* I fully and unconditionally support this policy.

Unfortunately, despite such brave words, GBC appears to be in breach of this policy itself through the housing policies that it has set out in the Local Plan. Around 65% of the developments proposed in the Proposed Submission Local Plan are to be built on land currently within the Metropolitan Green Belt. I consider this outcome to be outrageous.

There are also a number of further issues relating to the detailed implementation of this policy which are set out further below:

1. a) Paragraph 4.3.13: *Proposal to inset East Horsley from the Green Belt*

Policy P2 proposes that East Horsley should be inset from the Green Belt, instead of being 'washed over' as it is today.

East Horsley is set in a rural location and the village has the look and feel of a rural village. Its Green Belt status has been a key factor in preserving that character. Moreover, being 'washed over' by the Green Belt has not been a serious constraint on development within the village. For example, GBC's planning records indicate that no less than 149 net new homes were added to the village housing stock through in-filling and brownfield developments between 2000 and 2015.

Today East Horsley is a picturesque and flourishing rural community, which has and continues to experience steady incremental growth as a result of being 'washed over' by the Green Belt. As the saying goes: "If it ain't broke, don't fix it". This applies to East Horsley in the matter of insetting.

I therefore OBJECT to the proposal to inset East Horsley from the Green Belt and requests that this proposal be dropped from the Local Plan.
1. b) Paragraph 4.3.16 and Proposals Map: Settlement Boundary changes in East Horsley

GBC are proposing to make a number of changes to the settlement boundaries of East Horsley and so expand the settlement area, as set out in the Proposals Map, with the justifications seemingly provided in the Green Belt & Countryside Study prepared by the consultants, Pegasus.

We object to two specific boundary changes, which have been proposed, as follows:

1. There is a proposal to move the East Horsley settlement boundary westwards from behind the houses on the west side of Ockham Road North up to the eastern boundary of Lollesworth W. This proposal removes over 5 hectares of agricultural fields from the Green Belt. The present boundary line is clearly defined by a deep and well-maintained drainage ditch which is classified by the Environment Agency as a 'main river line' and therefore represents a highly defensible Green Belt boundary.

Moving this boundary west to the edge of woodland in no way improves its defensibility. Under NPPF rules Green Belt boundaries should only be changed in 'exceptional circumstances'. We do not believe this proposal can be considered as an exceptional circumstance. Clearly the only justification for this change is to bring a large agricultural field within the settlement area in order to provide more housing land. However, under NPPF rules this is not a sufficient justification for changing a Green Belt boundary. As such, I believe it is an invalid proposal.

I accordingly OBJECT to this proposed boundary change.

1. There is also a proposal to move the East Horsley settlement boundary westwards from behind the houses on the west side of Kingston Avenue up to a tree line running along the Parish Boundary at the western edge of Kingston. The result is to take all of Kingston Meadows out of the Green Belt.

Kingston Meadows is the main public recreational space of East Horsley, comprising various sports facilities and playing fields. The present settlement boundary is clearly defined by a deep and well-maintained drainage ditch running along its eastern side. It therefore represents a very defensible Green Belt boundary. Moving this boundary westwards to the edge of woodland in no way improves its defensibility. Under NPPF rules Green Belt boundaries should only be changed in 'exceptional circumstances'. I do not believe that this can be considered as an exceptional circumstance. As such, we believe this is an invalid proposal.

I accordingly OBJECT to this proposed boundary change.
In the Green Belt & Countryside Study and its accompanying Topic Paper, GBC justifies the need to make changes in settlement boundaries in order to meet unfulfilled housing need in the Borough. However, Green Belt rules make it clear that unfulfilled housing need is not normally considered to be 'an exceptional circumstance'. If it were the entire Green Belt would already be covered in tarmac.

The NPPF is clear that every movement in settlement boundaries must be justified by 'exceptional circumstances'. GBC have offered only a generic justification in their Topic Paper of meeting unfulfilled housing need, but a case by case justification has not been provided. As such, I believe the settlement boundary changes referred to above (and many others) are invalid without such detailed justification.

1. c) Paragraph 3.17: Proposal to remove Wisley Airfield from the Green Belt I OBJECT to the proposal to remove Wisley Airfield from the Green Belt.

The only justification for this proposed change is unfulfilled housing need which is not considered an exceptional circumstance. The proposed Wisley development is discussed further below in the Site Allocation section.

d) POLICY P2: Limited In-filling

A new planning designation has been introduced called 'the identified boundary of the village'. For East Horsley this covers a number of roads south of the A246. It is a sizeable area, covering 45 hectares, the equivalent of 23% of the present Settlement Area of the village. Within this area, Policy P2 sets out proposals that would allow 'limited in-filling' within this boundary.

I find it hard to reconcile the opening statement of Policy P2 that "We will continue to protect the Metropolitan Green Belt" with this sizeable reduction in effective Green Belt status. In my opinion, this policy represents a de facto extension of the Settlement Boundary and a substantial reduction in the operational effectiveness of the Green Belt, whose effectiveness is significantly weakened where this new planning designation applies.

I accordingly OBJECT to the proposal to designate roads south of the A246 as being within the 'identified boundary of the village' and to allow limited infilling within this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3147 Respondent: 15323041 / Jane Doherty Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I have no objections to this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3148  Respondent: 15323041 / Jane Doherty  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3149  Respondent: 15323041 / Jane Doherty  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3140  Respondent: 15323041 / Jane Doherty  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We support the objective of favouring sustainable development as set out in Policy Sl. It is in effect merely repeating what is already NPPF policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have carefully considered the Proposed Submission Local Plan which Guildford Borough Council ("GBC") has now published for public consultation. My comments are set out in this letter.

I have strong concerns about the Proposed Submission Local Plan and the evidence and assumptions which support it. In particular, I do not agree with the scale of the house building programme which is being proposed by GBC. The target outlined represents a 25% increase in the housing stock of the borough, whilst we note that the Office of National Statistics ("ONS") projects a population increase of some 15% for Guildford Borough over this same period.

I also note that the Proposed Submission Local Plan includes the statement "We will continue to protect the Metropolitan Green Belt". I fully support this policy. However, unfortunately GBC appears to be in breach of this same policy through the housing policies it has set out in the Proposed Submission Local Plan, whereby some 65% of developments will be made on land that is currently Green Belt.

I is also concerned that the infrastructure proposals are inadequate even to meet the needs of what is there at the moment, let alone the proposed developments in the Local Plan.

I therefore OBJECT to the Proposed Submission Local Plan.

Detailed comments on the six different policy areas which form the basis of the Proposed Submission Local Plan are now set out below, followed by my comments on specific site allocation policies

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
This policy sets out the objective of adding 13,860 new homes to Guildford Borough over the 2013-2033 period of the Proposed Submission Local Plan, equating to an annual build of 693 new homes per annum.

I have serious concerns about the enormous scale of this building programme, which represents a net increase of 25% in the housing stock of Guildford Borough, a remarkable rate of increase for a borough in the English Home Counties. It is even more remarkable when the official statisticians at the Office of National Statistics ("ONS") are projecting a population increase of some 15% for Guildford Borough over this same period.

I accordingly OBJECT to the borough housing targets set out in Policy S2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3175  Respondent: 15323041 / Jane Doherty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not share the same vision for the future of Guildford Borough as GBC, although I recognise that an enormous volume of work has gone into the preparation of the Proposed Submission Local Plan, which is now out for public consultation.

However, after more than 20,000 responses were submitted in 2014 in connection with the previous draft Local Plan, most of them opposed to its proposals, GBC has made relatively few changes from the earlier version and none of any materiality.

At the heart of the problem is GBC's desire to pursue a 'Forced Growth' policy which results in highly aggressive and unjustified targets being set for housing development in the Borough. These excessive targets - the proposed 25% increase in housing stock in particular - create a tremendous strain on both land and infrastructure in an already over-crowded and over-stretched part of the country.

These targets will also have a material adverse impact on the Metropolitan Green Belt across this area, despite all the political promises made to the contrary. The irony of Policy P2 which states that "We will continue to protect the Metropolitan Green Belt" does not fool anybody.

Accordingly I OBJECT to the Proposed Submission Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/955  Respondent: 15323841 / Claire Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

10. I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no schedule for Garlick’s Arch (A43), so the Plan takes no account of the infrastructure required for this site. It is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/954  Respondent: 15323841 / Claire Parker  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

9. I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans.

But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1456  Respondent: 15323841 / Claire Parker  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
6. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch is protected from development as Green Belt. There are no exceptional circumstances which allow for it’s removal from the Green Belt (Policy P2). Central Government state clearly that housing need is not an exceptional circumstance.

The Plan states the preference is to use of previously developed land, but GBC have removed a brownfield site at Burnt Common replaced it with Garlick’s Arch.

The site is not appropriate because:

- There is no sustainable transport infrastructure.
- The site is liable to frequent flooding
- The site has Ancient woodland and is a wildlife habitat, but no wildlife report for the site is in the Plan.
- There are no plans to improve local schools, medical or utilities to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1455  Respondent: 15323841 / Claire Parker  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

5. I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

North facing ramps to the A3 at Burnt Common would be a disaster for local communities, which do need to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic. E.g. all traffic from London/M25 to Woking would go through Burnt Common, Send and Old Woking. This is not sustainable as this cannot be improved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLP16/3177  Respondent: 15323841 / Claire Parker  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
8. I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

The Garlick’s Arch (A43) proposal would double the built area in the locality, and would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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12. I object to the employment strategy and impact at Garlick’s Arch (A43) (Policies E2 and E5)

There is no need for new industrial sites at Garlick’s Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000 sq m proposed. That site was removed from the Plan without any reasoning.

Furthermore the development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been for there decades employing local people and are therefore clearly sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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3. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

The plan will cause more congestion in Ripley, Send and Clandon. There is too much congestion already!

The rural roads in this area are narrow, in poor condition and have no footpaths. The number of houses proposed will mean dangerous and unsustainable traffic.
13. I object to the lack of proper infrastructure planning for sites (Policy I1)

The Plan does not identify adequate infrastructure improvements to support the huge scale of development, especially at Garlick’s Arch (A43) which has no infrastructure projects in the Infrastructure Schedule to support it. Local services, utilities and sewerage, doctors etc. are at or close to capacity.

There are no plans to improve the capability of the medical and police/emergency services to cover the 5000+ houses in the north east of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

14. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

The A3 or M25 would have to be improved before any development is done. Highways England has no plans to even start considering improving the A3 before 2020. Clearly no real improvements are possible in the timeframe of this Plan so the developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), should not take place.

I wish these objections to be fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

**Comment ID:** PSLPP16/3178  **Respondent:** 15323841 / Claire Parker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

11. I object to poor air quality concerns (Policy I3)

The huge developments being proposed, particularly in the north east of the borough will lead to considerable further congestion and to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/3172  **Respondent:** 15323841 / Claire Parker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

1. I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick’s Arch (A43).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/3174  **Respondent:** 15323841 / Claire Parker  **Agent:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4. I object to development in areas which are at risk of flooding (Policy P4)

The Plan does not take adequate account of flood risk as required by National Planning Policy.

The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3171  Respondent: 15323841 / Claire Parker  Agent:

Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2016).

I object on these grounds.

1. I object to the Local Plan as the development proposed is not sustainable (Policy S1)

The new housing proposed is not sustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve the infrastructure for Garlick’s Arch.

The development should be in urban areas where there is sustainable transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3176  Respondent: 15323841 / Claire Parker  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

7. I object to the Borough Wide Strategy (Policy S2)

GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

The Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing.

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/956  Respondent: 15323905 / Kerri Herbst  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

TO: LOCAL PLAN CONSULTATION, GUILDFORD BOROUGH COUNCIL

I OBJECT to Send Village being removed from the Green Belt. The Green Belt was intended to be permanent and there are no special circumstances abandoning it. Local councillors and central government gave a clear election promise to protect the green belt and this reneges on this.

I OBJECT to building 45 houses at Clockbarn Nursery because of inadequate access and traffic volume. The junction with Send road is already dangerous for vehicles trying to join the main road. Planning permission has previously been given for 64 apartments at the Tannery and for building the Marina both of which will generate additional heavy traffic.

I OBJECT to building 400 houses and 7000 sqm of Industrial space at Garlicks Arch opposite Send marsh Road. The site floods and is covered by ancient woodland. The industrial space is not needed but if it were it should be at Slyfield. Slyfield also has many vacant industrial units.

I OBJECT to the development of 40 houses and 2 travellers pitches at Send Hill. It is an inappropriate location as a narrow width single access country road. Any development there would spoil a high amenity area set in beautiful countryside. For more detailed lines of rejection please contact Send Hill resident [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998.]
I OBJECT to a new interchange with A3 at Burnt Common as Send would have to take traffic from the proposed 2000 new houses at Wisley airfield, 2000 houses at Gosden Hill, Burpham and 1850 at Blackwell Farm. Send Road which is already overloaded would become gridlocked with noise and pollution levels that is already excessive.

I request that my list of objections and comments are shown to the Planning Inspector and would like to receive confirmation that this communication has been received.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPA16/957  Respondent: 15324065 / Patricia Maxwell  Agent: 15324065 / Patricia Maxwell

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Re: Objections to GBC Submission Local Plan (June 2016)

We STRONGLY OBJECT to the removal of Send, Ripley and Clandon plus sites at Wisley Airfield and Garlick's Arch. There are NO EXCEPTIONAL CIRCUMSTANCES for Garlick's Arch to be removed (Policy 2) when there is an existing brown field site at Burnt Common.

The disproportionate number of new houses (13,860) is totally unsustainable, local villages will be irreparably damaged and do not require these houses. All local schools and and medical services are almost at capacity. There are inadequate bus services and the nearest main line stations are Guildford or Woking so the majority of journeys will be made by car.

Local village roads all ready suffer with too much traffic and are narrow, in poor condition and without footpaths, with 5,000 more houses this uns sustainable and potentially dangerous.

Insufficient account has been given to to the flood risk (Policy P4) at the site of Garlick's Arch which was classified by the Environment Agency as higher than the council assessment. There have been several floods in recent years and destruction of ancient woodland and wildlife habitats at this site is unacceptable.

WE STRONGLY OBJECT to this huge number of houses which is totally unbalanced and could see the small villages merged to become an urban sprawl and a catastrophic destruction of the character of the area.

In conclusion:- WE STRONGLY OBJECT TO

Lack of infrastructure i.e. local services, utilities, sewerage, doctor and schools (both almost at capacity)
Traffic congestion with greater levels of air pollution
Flooding risk
Medical/police emergency services capabilities
Destruction of green fields, wildlife habitats, ancient woodland and character of areas
Catastrophic destruction and merging of small villages

Please carefully and fully take into consideration these objections and accordingly amend the local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPA16/958  **Respondent:** 15324097 / Stephen Davison  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send Marsh/ Burnt Common

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I am writing to object to the above plan for the Send and Ripley areas.

I object to Send village being removed from the Green Belt. It is a green and pleasant area, at the moment. I moved here from London to raise a family, away from excessive car fumes, tarmac and concrete, and am dismayed that there are plans to make this a similar environment, that I, and others, have strived to move away from. I therefore object to any plans that will remove, our ever disappearing countryside.

I object to the building of houses at Clockbarn Nursery, for the same reasons as above, and additionally for the extra strain this would mean on local roads.

I object to the building of houses and industrial space at Garlick's Arch. Again, for the same reasons as stated in my first paragraph. This development would be detrimental to the woodland and green fields it would involve.

I object to the development at Send hill. This is now a pleasant area, since being transformed from a previous landfill site, and feel it should be left in its current appearance.

I object to a new interchange at the A3 at Burnt Common, as this would funnel even more traffic into this area, resulting in more pollution and vehicles using Send road.

Finally, can you confirm to me that you have received these objections, and that comments have been shown to the planning officer.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/3202  **Respondent:** 15324129 / Giorgia Argano  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I own a property located in Ganghill and am emailing in respect of the above to communicate my support of the Guildford
Residents Association's response and oppose Guildford expanding by a quarter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/959  Respondent: 15324193 / Philip and Josephine Paul  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Ripley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We strongly object to the planned removal of Green Belt status for the village of Ripley and Send to accommodate
extensive development of the immediate area. I refer to the Garlic Arch proposed development. This will put
an intolerable strain on local traffic congestion and services. This development plus some other smaller ones would have
the effect of more than doubling the current population of 1500. It could easily increase the number of cars using local
roads by 1000. An increase in population would put an intolerable strain on already stretched services.

The other concern we have is that by removal of the Green Belt status it will have the effect of pushing Ripley nearer to
Guildford making Ripley a suburb of Guildford and loose it village status and uniqueness which makes it one of Surrey's
much loved villages for inhabitants and visitors alike.

Please, Please reconsider this plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1460  Respondent: 15324289 / Derek Lambert  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
With reference to the proposed possible development at the above location I would like to object to this on the following points,

1. The number of properties proposed are far in excess for the size of the village which would increase it by 100%. The additional traveller pitches proposed are not necessary as we already have a number of pitches in the bounds of Normandy

2. The development is on green belt land which this Government said they would always protect the green Belt, what has happened to this promise?

3. It is unnecessary to have a new secondary school in this area when the 2 local secondary schools are not fully subscribed. We do not require another village green as we have one already which is more central in the village I feel these two points have been put forward as sweeteners for the Guildford Borough Council.

4. Westwood lane is not a main road and often has heavy traffic during peak times as a through route to the hogs back A31 or the A3, and with the possibility of 600-800 additional vehicles emerging onto Westwood lane trying to get to either of those two main roads would be over and above what the road can cope with. Whichever way the traffic travels there is a rail bridge which is only one way, and we have already had a fatality there where a vehicle hit the bridge and caught fire. Or if they try to merge onto the A323, the site lines are very restricted especially if you are turning right to Guildford.

5. The station car park is not capable of taking more cars and there is no room for increasing the size, which would mean that there would be cars parking in the surrounding roads. Glaziers lane is a lorry route and therefore additional cars parked in the road would also be a problem

6. This development would disrupt the infrastructure of the village and the destruction of our rural environment.

I would ask the planning committee to think hard about this development. And I wish to strongly object to the proposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1464  Respondent: 15324609 / Lina le Roux  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A21

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This is to let you know that I support this policy of retaining this land for allotment use.

I was recently (about a month ago) allocated a plot on the Aldershot Road allotment site, after having been on the waiting list for a while. It really is a wonderful place. As soon as we walk through the gates, all the stresses of everyday life are forgotten. My whole family has gotten involved in the allotment, my husband doing a lot of the heavy digging required to get the plot ready to cultivate things and our two little boys (5 and 2 years old) "help" too, using their own little gardening tools and they love to pick raspberries and gooseberries (the only things other than weeds we inherited when taking over the plot). Having an allotment is a great opportunity to spend quality time together as a family outdoors, we have been spending a lot of time at weekends on the site since we got it, staying the whole day and bringing our own picnic lunch. Tristan, our older boy, has really enjoyed sowing vegetable seeds and planting seedlings the last few weekends and wants to go there every day to check if any new shoots have appeared! In the longer term I believe having an allotment will be a positive thing in terms of a more active lifestyle and spending more time outside and growing some of our own fruit and vegetables.

As I mentioned above, the Aldershot Road site really is a lovely place, set on a hill away from traffic noise. While we were on the waiting list for this site, we were offered a plot on a few other sites, none of which had the same look or feel. It is also a very friendly site. Since joining, we have been made to feel very welcome and everyone is very friendly, stopping for a chat, giving advice and encouragement. The site also runs a plot for a local school and helps novice gardeners with their plots.

I should also add that retaining the lower vehicular access is very important to the site as this is really the only safe access point for vehicles (needed for delivering things to the plots and, more importantly, for ambulance access in case of emergencies). I believe there may be some tentative plans for an alternative, whereby a new access point at the top of the site would replace the current main access. However, to do this I understand that a new road will be needed through the site, which would involve the loss of all the outer plots (including our own). For obvious reasons we are strongly opposed to this idea.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1468  Respondent: 15324673 / Michael Brooke  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

   • I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

      1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
      2. The increased volume of cars. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads - there are already significant congestion issues on Old Lane and Effingham Common Road during peak hours - there is no capacity for this level of increase especially when also considering wide vehicles including increased bus and HGV movements.

      1. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as Local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
      2. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity with dangerous parking on the verge of Effingham Common Road already a regular occurrence. Any assertion that residents will use other stations in the area is pure fantasy.

   • I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

   • I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. As a father of two young children, this is clearly of much concern. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

   • I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning Committee - I objected to that planning application on the very same basis that I am objecting to its inclusion.

Answer (if comment is on questions 1-7 of the questionnaire): ()
in the local plan.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 5th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/964  Respondent: 15324705 / Isobelle Keywood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of immediate provision for new schools.

I object to the lack of the immediate provision of Doctors surgeries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/963  Respondent: 15324705 / Isobelle Keywood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of any evidence for the alleged housing numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3218  Respondent: 15324705 / Isobelle Keywood  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object strong to the 2016 New Local Draft Plan.
I object to the erosion of the Green Belt.
I object to the insetting of any villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLP16/3219  Respondent: 15324705 / Isobelle Keywood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the disproportionate amount of development in one area of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/674  Respondent: 15324705 / Isobelle Keywood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the limited consultation period.

I object to the last minute inclusion of new sites with less than 2 weeks notice.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/966  Respondent: 15324833 / Ann Gifford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of any evidence being produced for the alleged housing need numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1471  Respondent: 15324833 / Ann Gifford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the building of 400 houses and 7000 sq metres of industrial space at Garlicks Arch. It was a very late addition to the Local Plan and a big surprise. In addition to being in the Green Belt the area has flooded in the past and is covered by ancient woodland. The roads in the area of Send and Ripley are already very busy and vary from slow to gridlock at peak times. Adding a large number of homes and businesses will aggravate this situation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3220  Respondent: 15324833 / Ann Gifford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to any villages being removed from the Green Belt. The Green Belt was set up as a permanent policy to protect our green spaces. These green areas contribute positively to our health and well-being and prevent over development. Currently, brownfield sites are still available and should be used as a priority.

Please do not destroy the Green Belt for us and the future generations.

Please confirm that my email has arrived safely and that my comments have been passed to the Planning Inspector.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3221  Respondent: 15324833 / Ann Gifford  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the disproportionate amount of development planned for one area of the borough. Smaller developments around the whole of Guildford infilling and using brown field sites should be the priority.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2383  Respondent: 15324833 / Ann Gifford  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
It will result in Send, a small village, becoming overdeveloped.

Too many new houses for the current infrastructure to cope with.

The local roads in Send and Ripley are extremely busy with commuter traffic everyday and wouldn't be able to cope with all the extra cars etc.

The area is subject to flooding so not suitable for further development.

An area of ancient woodland, part of the Green Belt, would be destroyed for an unnecessary development.

Very few travelling shows come to this area so I can't see a need to accommodate them.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

| Comment ID: pslp172/2384  Respondent: 15324833 / Ann Gifford  Agent: |
|---|---|
| **Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A58 |
| **Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )** |
| **Answer (if comment is on questions 1-7 of the questionnaire): ()** |

Slyfield and Guildford still have industrial sites available so there is no need to build on the Green Belt.

The impact on local roads will cause traffic gridlock.

I hope that the council will reconsider these plans and not disregard the objections of so many people.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

| Comment ID: PSLPS16/1472  Respondent: 15324993 / Susan Mills  Agent: |
|---|---|
| **Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A37 |
| **Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )** |
| **Answer (if comment is on questions 1-7 of the questionnaire): ()** |
I object to the Guildford Local Plan 2016 for the following reasons West Horsley should remain in the Green Belt.

An increase of 35% of housing would have a big impact on our village.

Our local State schools are already full and children would have to travel further to school which would then see an increase in traffic.

Parking at the station is at a premium during the week

Most families now own two cars so with an increase of 35% housing we would see an increase of 70% in traffic. Our roads and pavements are already in a poor state.

Our roads would be gridlocked.

Thames Water have advised that the current waste water network in the area is unlikely to be able to support demand anticipated and would need upgrading.

The proposed increase would be totally out of character with our village which has many old buildings and a mix of different housing styles.

We live in an area of Outstanding Natural Beauty and it should be preserved for future generations to enjoy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1476  Respondent: 15325409 / Charles Mills  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A38

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to object to the contents of the Guildford local plan for the following reasons: We already have a crowded village with many facilities under heavy strain:

The Raleigh school is already full with no room for expansion and other schools are full to capacity.

Car parks at the station and in the village are heavily used
Thames water have advised that the current waste water network in the area is unlikely to be able to support demand anticipated and would need upgrading.

East and West Horsley will be swamped with extra cars and people using shops, station, village halls sports and other facilities.

Medical facilities would be put under strain.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1479  Respondent: 15325505 / Mark Dominey  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to this development plan. The 45 proposed houses will add further traffic to an area soon to be overwhelmed. The lane the junction with Send road is not big enough to cope. The planning permission already granted for the development at the Tannery will only see further traffic volume.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1477  Respondent: 15325505 / Mark Dominey  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to these development plans. The proposed 400 houses, 7000 m² industrial development, slip roads and junction from the A3 is very much over what the small villages of Send and Ripley can handle. This is lovely countryside in a green belt area, the developments and junction would route heavy traffic from the A3 and M25 through to Woking; the area would become a traffic jam, completely spoiling it. The village medical centre and school would also be overwhelmed. The proposed developments have also not previously been subjected to public consultation. Surely Guildford Borough Council need to follow the correct process here and conduct a full consultation under Regulation 18. The process appears invalid.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1478  Respondent: 15325505 / Mark Dominey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object to this development plan. This is a beautiful green belt area and inappropriate for the proposed development. The area would be completely spoiled and the single track road is not sufficient for access. This is also a new proposal not previously consulted upon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3242  Respondent: 15325505 / Mark Dominey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object to this development plan. This is a beautiful green belt area and inappropriate for the proposed development. The area would be completely spoiled and the single track road is not sufficient for access. This is also a new proposal not previously consulted upon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<tr>
<th>Comment ID: PSLPA16/972</th>
<th>Respondent: 15325537 / J.M Middlemiss</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to any building in Send and local areas on Green Belt Land. Causing more traffic congestion and the destruction of wildlife to the countryside and the village of Send.</td>
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<th>Respondent: 15325569 / Oscar Walker</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to Policy A41 the new draft local plan which contains a new proposal to build 90 homes on the open fields (green belt land) of West Horsley in addition to the already proposed 135 houses at Manor Farm (Policy A38),120 houses at Waterloo Road (Policy A40) and 40 at Bell and Colvill (Policy A37).</td>
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<tr>
<td>I have lived in East Lane all my life and I think that this new site (A41) is one of the most distinguishing rural aspects of the village and if allowed to be developed will destroy the character of West Horsley. West Horsley is a rural village and one of its main features is that on the entry roads to the village (mainly Long Reach in this instance) there is a vista across fields as there is only development on one side of the road. These fields have no houses on any side and do not abut the currently defined village settlement on any side and so cannot be considered an extension of the settlement or infill at all. It doesn't appear to me to be suitable land for development without destroying the green belt and the current village.</td>
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<td>There is also no infrastructure for all these new homes. There are only 2 shops in West Horsley, no post office, no medical centre and very little public transport. The roads are already very busy with traffic and the new houses will only add more.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As a resident, I write to strongly object to the proposed developments of East and West Horsley in the Draft Local Plan. The numbers of new homes is out of proportion and is based on out of date population data as the basis for the plan.

The council cannot keep the local roads in good order as it is, how will it cope with the extra traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/976  Respondent: 15326209 / Kirsten Allan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to proposed developments of East and West Horsley in Guildford Borough Council’s Draft Local Plan. The numbers of new homes is out of proportion and is based on out of date population data as the basis for the plan.

The infra-structure is not in place; there are no more secondary school places, the current train station car park is full by 08.30hrs and the morning commuter trains are crammed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1481  Respondent: 15326241 / Judith Virley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings.

I wish to object to the part of the draught Local Plan. My objections are given below:

- I object to the Local Plan in so far it includes a proposed large development of housing for Wisley. Such a development will have a huge and unacceptable impact on the other local villages of Ripley, Send and the Horsleys, all of which also have new housing developments in substantial numbers included in the Plan. The proposed building in the local plan of the development on Wisley Airfield will change and spoil the whole character of the area.
- I also object to the removal of the former Wisley Airfield land from the Green Belt in order to facilitate the development of numerous dwellings. The point of the Green Belt is to protect the countryside for the future.
- The proposals for the housing development at Wisley Airfield, plus other proposed housing developments in Ripley, Send and the Horsleys are likely to result in 4,000-5,000 additional cars moving in and out of these areas on a daily basis. This increase in the volume of traffic will result in traffic congestion problems on all the local rural narrow roads. Also, local amenities are not sufficient to cope with this influx of people and transport.
- I also object to the local plan’s proposed housing developments in The Horsleys, Send and Ripley which are all building over fields and woodland which will be lost for ever.

I hope you will take note of my objections and particularly the former Wisley Airfield is removed from the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to new sites (Garlicks Arch) being introduced as an after thought when it was not even considered in the previous plan. A slip road on the A3 at Burnt Common has been added to the Draft Local Plan without Highways England consent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3243  Respondent: 15326273 / John Haslam  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to a totally unrealistic number of houses for the country lanes to absorb.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3250  Respondent: 15326273 / John Haslam  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the 2016 Draft Local Plan as it has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3246  Respondent: 15326273 / John Haslam  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3245  Respondent: 15326273 / John Haslam  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3247  Respondent: 15326273 / John Haslam  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners’ views, or the costs involved in improving the infrastructure, currently out side their financial capability.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT

EVIDENCE.

GBC have failed to provide sound evidence in terms of the Employment Land Needs Assessment 2015 (ELNA) which shows an 80% reduction in employment space from the previous ELNA carried out by GBC in 2013. This means that industrial space at Burnt Common is no longer needed. Housing numbers from the Strategic Housing Market Assessment 2015 (SHMA) are highly questionable. The number of foreign students has been wrongly used to inflate the need. The required 13,860 houses in the local plan is exaggerated. If the population is to grow by some 20,000 in the plan period, we actually need 8,000 homes (based on an average of 2.5 persons per home).

The Green Belt does not need to be built over. 50% of new homes needed could be built on brownfield sites. GBC’s Transport Assessment was not even available to councillors for the vote taken on 24 May, being published on 6 June. Infrastructure overload has received scant attention.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT

Policy A25

Gosden Hill Farm Merrow

This is clear contravention of central government policy of stated commitment for Green Belt Protection. The effect on local amenities would be catastrophic as regards local hospitals, schools, traffic and the environment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1490  Respondent: 15326369 / J D W Todd  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT

Policy A35 p124 and 203

Land at the previous Wisley Airfield like Gosden Hill is close to Send and Ripley and will cause significant traffic flows on the A3 and M25 as well as the effect on local amenities. This would also be catastrophic as regards local hospitals, schools, traffic and the environment.

Overall the increase in the population of Send as already envisaged by developments in the area will impose an intolerable burden in the infrastructure such as Schools, the Villages Medical Centre, Roads, local Hospitals, parking for local shops, sewerage and internet provision (which is barely adequate at present). I see nothing in the Local Plan concerning such issues and until these issues are addressed satisfactorily in detail any further development should be rejected. There would seem to be a hidden agenda and vested interests by some members of the committee being brought to bear on the overall policies being put forward by the planning committee to the detriment of the Send area and its environs which seems to have been singled for intensive development and this is totally unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT

Policy A42

Clockbarn Nursery, Tannery Lane, Send

This will cause unacceptable traffic levels in Tannery Lane. To the east of the exit the road is narrow (single track in places) with several blind bends exiting into Newark Lane which itself feeds a very narrow and congested junction on to the B2055 in Ripley High Street whilst to the west it feeds onto the A247 a junction with restricted sight lines due to parked cars during the day. It will also add to the additional traffic generated by the proposed marina which is also accessed via Tannery Lane

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT

POLICY A 43

. 30 ha LAND AT GARLICK'S ARCH, Burnt Common, designated for 400 houses and 7,000 sq m of industrial and warehousing. There is no need for any more houses on top of the 13,860 already proposed for the borough. This site is NEW and was not included in the Regulation 18 draft and has NOT been consulted upon previously. It is Green Belt permanently protected by the NPPF which prevents the merging of settlements. There are no exceptional circumstances. The site has a particular conservation sensitivity since it is covered in ancient woodland. Trees which existed in the 16th century would be endangered. The proposed industrial development of 7000 sq m is simply not required since the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan. If there is a need for 7,000 sq m of industrial space it should be at Slyfield.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPS16/1486  **Respondent:** 15326369 / J D W Todd  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43A

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT

**Policy A43A**

A new 4-way interchange onto the A3 at Burnt Common would be disastrous for Send. Send Road (A247) would be gridlocked all day. Send would be the through route to Woking for traffic leaving the M25 and A3, the proposed 2,000 houses at Wisley and the 2,000 houses at Burpham. However a 4 way interchange might alleviate the traffic through Ripley which already approaches levels when it was a trunk road (A3) before the Ripley bypass was built. However if the developments in the draft plan were to go ahead any such gain would be negated and the A247 through Send grid locked with risk to children attending the new Send Schools. Further as shown the off slip road to the southbound A3 would increase the traffic at the junction with the A247, already a the scene of many accidents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/1487  **Respondent:** 15326369 / J D W Todd  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT

**POLICY A44**

1.9 ha LAND WEST OF WINDS RIDGE AND SEND HILL designated for 40 homes and 2 Travellers Pitches. This site is NEW and was NOT included in the regulation 18 draft and has NOT been consulted upon previously. Originally in the 1990s GBC purchased this site with the express propose to prevent travellers access and to the triangle to the east end of this site. No account or reason has been given by GBC for this change in policy.

Development for housing is inappropriate due to its permanent Green Belt status and high quality Green Belt amenity within an area of beautiful countryside which would be spoilt by any development. The subsoil of the existing site contains documented unsafe land fill waste which is currently vented. The proposal to include 2 Travellers Pitches is inappropriate due to the narrow width single track country road at one end providing insufficient access to the site whereas the other end
already carries a heavy volume of traffic at school opening and closing times and would put children at risk. There is already gridlock at Send Traffic lights at these times and along the A247. NOT taken into consideration are the proposals to the building of a new school to replace St.Bedes. As these stand at present access to the new building would appear to be via the A247 only which might alleviate the traffic at the bottom of Send Hill but it is inconceivable that this will remain so because the School traffic on the A247 at school times with parents from both Schools picking up and setting down will cause gridlock on this road which will extend from about 3 pm into the evening rush hour. It is thus likely that the entrance to the school off Send Hill will be reinstated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>PSLPP16/3248</th>
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I OBJECT

POLICY P2.

SEND SHOULD NOT BE REMOVED FROM THE GREEN BELT. Send provides a buffer between Woking and Guildford.

The particularly vulnerable areas of land being taken out of the Green Belt include

1. The land behind the school including playing fields and woodland.
2. The land to the right of Cartridge by the River Wey Navigation up to the new boundary fence with Vision Engineering.
3. Land to the left of Cartridge going up to the old depot on the Wey Navigation.
4. Land west of Winds Ridge. This will now protrude into the surrounding countryside like a carbuncle whereas before there was a clean straight line behind the Send Hill properties (formed by a footpath) a much more natural boundary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>SQLP16/679</th>
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</table>
I OBJECT

GBC HAVE NOT FOLLOWED CORRECT PROCESS.

GBC have been guilty of very underhand sleight of hand procedures in drafting this new plan

Since 2014 GBC has changed every major site in Send proposed for development and now just added a major new road junction. The southbound off slip road from the A3 at this junction will increase traffic turning right onto the A247 which is already a site of many minor (so far minor!) accidents. The 2014 proposal for 430 houses went down in April 2016 to 185 and has just gone up again to 485. These significant changes require another full consultation under Regulation 18, not the short cut of Regulation 19 which GBC are trying to get away with. This invalidates the whole process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/216  Respondent: 15326369 / J D W Todd  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Green Belt, Policy 2 at paragraph 4.3.15

Send Business Park now taken out of the Green Belt altogether

I object to the proposal to inset Send Business Park from the Green Belt because:

1) It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation

2) There is highly restricted vehicular access along Tannery Lane in both directions: more traffic in Tannery Lane will have a knock on effect on the traffic in Newark Lane in particular at the junction with the B2215 in Ripley High Street

3) Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate.

But, instead of making any real attempt to mitigate and amend the plan, GBC has made it worse In a normal planning process a local planning authority listens carefully to the objections and alters its proposals to take account of those objections. GBChas not listened at all. The Send area has been targeted disproportionately. Major sites in the village have changed three times. First, Burnt Common, then Garlick Arch and now both of them. GBC appear to have a predetermined agenda to build on the Green Belt and without any reasonable constraints to take account of inadequate infrastructure roads, schools, medical facilities as required by law. The traffic and pollution implications of the current proposals are completely unacceptable

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2043  Respondent: 15326369 / J D W Todd  Agent:
**Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

Clockburn Nursery, Tannery Lane,

Policy A42 60 homes in place of 45 homes previously

I object to the Policy A42 change at Clockbarn in Tannery Lane because:

1) The increase to 60 homes in place of 45 homes is 33% more and excessive
2) It ignores all the hundreds of previous objections made by local people
3) It will worsen access and traffic problems in Tannery Lane and at the A247 junction
4) It will make erosion of the Green Belt in our village worse
5) It will make surface water flooding, which is already bad, even worse
6) It will impact open countryside views from the River Wey Navigation

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID: pslp172/2044  Respondent: 15326369 / J D W Todd  Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

Land at Garlicks Arch, Send Marsh, Policy A43.

400 homes and 6 Travelling Show people plots

I object to the Policy A43 change at Garlicks Arch because:

1) It ignores all the thousands of previous objections made by local people
2) There is no proven demand for Travelling Show people plots in this location
3) It is beautiful permanent Green Belt and no exceptional circumstances exist
4) It will cause over-development of our village and the number of homes is excessive
5) It is ancient woodland that existed at the time of Elizabeth 1

6) It will join up Ripley and Send and defeat the key purpose of Green Belt

7) It is subject to frequent flooding and is currently a flood zone 2 allocation

8) It is contaminated by lead shot accumulated over fifty years

9) It will generate excessive traffic that will block up the local roads of Send and Ripley where parking is almost impossible at many times of the day

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2045  Respondent: 15326369 / J D W Todd  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Land at Burnt Common, London Road, Policy A58.

Now a new allocation for a minimum of 7,000 sq m of industrial or warehousing

I object to Policy A 58 at Burnt Common because:

1) It was deleted from the 2014 draft because of all the objections made previously. The word minimum is a change from the previous maximum in the 2016 plan and since that time there has been a decline in demand for industrial land

2) There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt

3) The impact on small surrounding roads will create more traffic

4) It will join up existing villages and defeat the purpose of the Green

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/981  Respondent: 15326401 / Claire Haslam  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1493  Respondent: 15326401 / Claire Haslam  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to new sites (Garlicks Arch) being introduced as an after thought when it was not even considered in the previous plan. A slip road on the A3 at Burnt Common has been added to the Draft Local Plan without Highways England consent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3251  Respondent: 15326401 / Claire Haslam  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to a totally unrealistic number of houses for the country lanes to absorb.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3266  Respondent: 15326401 / Claire Haslam  Agent:
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<th>Respondent: 15326401 / Claire Haslam</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object to the removal of villages from the Green Belt.</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.</td>
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Comment ID: PSLPP16/3265  Respondent: 15326401 / Claire Haslam  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners’ views, or the costs involved in improving the infrastructure, currently outside their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/983  Respondent: 15326465 / James Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

10. I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no schedule for Garlick’s Arch (A43), so the Plan takes no account of the infrastructure required for this site. It is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/982  Respondent: 15326465 / James Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
9. I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans.

But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1492   Respondent: 15326465 / James Parker   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

6. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch is protected from development as Green Belt. There are no exceptional circumstances which allow for it’s removal from the Green Belt (Policy P2). Central Government state clearly that housing need is not an exceptional circumstance.

The Plan states the preference is to use of previously developed land, but GBC have removed a brownfield site at Burnt Common replaced it with Garlick’s Arch.

The site is not appropriate because:

• There is no sustainable transport infrastructure.
• The site is liable to frequent flooding
• The site has Ancient woodland and is a wildlife habitat, but no wildlife report for the site is in the Plan.
• There are no plans to improve local schools, medical or utilities to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1491   Respondent: 15326465 / James Parker   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

5. I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

North facing ramps to the A3 at Burnt Common would be a disaster for local communities, which do need to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic. E.g. all traffic from London/M25 to Woking would go through Burnt Common, Send and Old Woking. This is not sustainable as this cannot be improved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3257  Respondent: 15326465 / James Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

8. I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

The Garlick’s Arch (A43) proposal would double the built area in the locality, and would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3260  Respondent: 15326465 / James Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
12. I object to the employment strategy and impact at Garlick’s Arch (A43) (Policies E2 and E5)

There is no need for new industrial sites at Garlick’s Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000 sq m proposed. That site was removed from the Plan without any reasoning.

Furthermore the development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been for there decades employing local people and are therefore clearly sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3254  Respondent: 15326465 / James Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

The plan will cause more congestion in Ripley, Send and Clandon. There is too much congestion already!

The rural roads in this area are narrow, in poor condition and have no footpaths. The number of houses proposed will mean dangerous and unsustainable traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3261  Respondent: 15326465 / James Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
13. I object to the lack of proper infrastructure planning for sites (Policy I1)

The Plan does not identify adequate infrastructure improvements to support the huge scale of development, especially at Garlick’s Arch (A43) which has no infrastructure projects in the Infrastructure Schedule to support it. Local services, utilities and sewerage, doctors etc. are at or close to capacity.

There are no plans to improve the capability of the medical and police/emergency services to cover the 5000+ houses in the north east of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3262  Respondent: 15326465 / James Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

14. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

The A3 or M25 would have to be improved before any development is done. Highways England has no plans to even start considering improving the A3 before 2020. Clearly no real improvements are possible in the timeframe of this Plan so the developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), should not take place.

I wish these objections to be fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3259  Respondent: 15326465 / James Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
11. I object to poor air quality concerns (Policy I3)

The huge developments being proposed, particularly in the north east of the borough will lead to considerable further congestion and to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

2. I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick’s Arch (A43).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

4. I object to development in areas which are at risk of flooding (Policy P4)

The Plan does not take adequate account of flood risk as required by National Planning Policy.

The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2016).

I object on these grounds.

1. **I object to the Local Plan as the development proposed is not sustainable** (Policy S1)

The new housing proposed is not sustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve the infrastructure for Garlick’s Arch.

The development should be in urban areas where there is sustainable transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
7. I object to the Borough Wide Strategy (Policy S2)

GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

The Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/ Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing.

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
General Policies relating to Send Parish. Sites (A42, A43, A43a, A44)

1. **Send Removal from Green Belt**: I **OBJECT** to removal of Send from the Green Belt as this will remove part of the necessary buffer between Guildford and Woking, increasing the risk that a large conurbation will form. There are no exceptional circumstances that justify the removal.

2. **Building on Current Green Belt land**: I **OBJECT** to the proposed development sites current Green Belt sites at Clockbarn Nurseries, Garlick’s Arch, and Send Hill since there are no special or exceptional circumstances which justify removal of their Green Belt status.

3. **Due process**: I **OBJECT** to the proposed development sites at Clockbarn Nurseries, Garlick’s Arch, and Send Hill since they were not included in the previous Draft Local Plan consultation exercise in 2014. Send sites were all substantially changed without the proper two-stage process of consultation being followed, unlike the rest of the Guildford Borough.

4. **Traffic levels and associated environmental issues**: I **OBJECT** to the proposed Burnt Common interchange that will increase both traffic movement levels through the Parish and the level of traffic related pollutants over wide areas in the Parish.

5. **Housing Numbers**: I **OBJECT** to development of sites at Clockbarn Nurseries, Garlick’s Arch, and Send Hill since the number of houses proposed (485 + 2 traveller pitches) will increase the number of houses in Send by 25% which is incompatible with maintaining Send’s current rural nature.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/1495  **Respondent:** 15326657 / Janet Davie  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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**b. Garlic’s Arch and Burnt Common Interchange (site nos. A43 and A43a)**

1. **Outside current development boundary**: I **OBJECT** since this development lies outside the existing housing outline of the village, and should therefore be deleted to avoid both loss of green belt land and creeping development between Send, Woking, and Guildford.

2. **Traffic Infrastructure Capacity**: I **OBJECT** to the proposed new interchange onto the A3 at Burnt Common since this would generate significant new traffic movements that surrounding roads cannot accommodate.

3. **Traffic Infrastructure Evidence**: I **further OBJECT** to the proposed new interchange onto the A3 at Burnt Common since associated transport evidence is incomplete and does not justify additional A3 access at this location.

4. **General Infrastructure**: I **OBJECT** to development at Garlick’s Arch for 400 houses as there is insufficient infrastructure to support the development, including utilities, social amenities, schooling, public transport, and medical facilities.

5. **Industrial use**: I **OBJECT** to the proposed industrial development of 7,000 sq m at Garlick’s Arch because it is not a sustainable development. It is removed from the major population centres in Guildford and Woking necessitating a large increase in public transport services and/or major additional traffic movements for staff travel and business logistics. If there is a need for 7,000 sq m of industrial space within the Borough it should be located at Slyfield where there is a 40ha site available and where it would be largely welcomed.
6. **Flooding**: I OBJECT to development at Garlick’s Arch. This area is classified by the Environment Agency as being in a higher flood risk area than the Council’s own assessment and has flooded many times in recent years. Therefore the Council’s own assessment is invalid and the site must not be developed.

7. **Environment**: I OBJECT to the destruction of the Ancient Woodland on the site, which includes over 80 ancient oak trees.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/1494  **Respondent:** 15326657 / Janet Davie  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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3. Specific Sites

1. **Send Hill (site no. A44)**

2. **Site Access**: I OBJECT since this development will increase traffic along Send Hill. This is a very narrow road (or lane) that, for one third of its length, permits only single file traffic. Any increase in traffic volumes must increase the risk of accidents. I have already witnessed several occasions where two cars only just missed hitting each other (i.e. coming head to head). I personally avoid using this road due to the perceived risk of a serious accident. In addition the junction between Send Hill and Potters Lane is hazardous, due to poor sight lines, with numerous accidents observed.

3. **Flooding**: I OBJECT since part of the site comprises a bowl formation that has flooded most winters for many years. This, together with a large pond on adjacent land, indicates a high water table in this area. Any disturbance to the site would possibly alter the water table thus causing flooding to adjacent properties.

4. **Site Contamination**: I OBJECT since Guildford Borough Council used the site as a refuse tip/landfill site for many years. The site is therefore unsuitable for development on health grounds.

5. **Site Over development**: I OBJECT since the site is too small for the proposed uses.

6. **Outside current development boundary**: I OBJECT since this development lies outside the existing housing outline of the village, and should therefore be refused to avoid both loss of green belt land and creeping development between Send, Woking, and Guildford.

7. **Increased demand on village services**: I OBJECT since this proposed development will add additional houses to the existing village stock, thereby increasing demands on existing village services, e.g. schools and health services. These are already recognised as being oversubscribed. Any development, which further increases demand, must be deferred until after additional investment by the Borough/County has increased their capacities.

8. **Loss of amenity**: I OBJECT since the site has been used as a public open space for many, many years. It is understood the timescale is such as to confer the formal status and protection of Public Open Space status to the site, which then prohibits development

9. **Loss of amenity**: I OBJECT since the site is part of the rural nature of this part of Send. Adding houses, and associated access/service roads, will detract from this setting, be visible for long distances, and will adversely alter the character of the area. In particular scenic views to and from the River Way and St Mary’s Church will be adversely impacted.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
Comment ID: PSLPP16/3264  Respondent: 15326657 / Janet Davie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

b. Building on Current Green Belt land: I OBJECT to the proposed development of current Green Belt sites at Clockbarn Nurseries, Garlick’s Arch, and Send Hill since there are no special circumstances which justify removal of their Green Belt status.

c. Process: I OBJECT to the failure of Guildford Borough Council to identify sufficient brownfield sites within existing urban areas that should be targeted for development before the open countryside and the Green Belt.

d. Process: I OBJECT to the failure of Guildford Borough Council to include the Town Centre Masterplan 2015 within the overall Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4348  Respondent: 15326657 / Janet Davie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3. Specific Sites
Clockbarn Nursery Tannery Lane (Site No. A42)

• Scale of development: I OBJECT to the proposed increase from 45 to 60 homes because increased development in the area will harm the open aspect of the area and views associated with the Wey.

• Scale of development: I OBJECT to the proposed increase from 45 to 60 homes because this area is acknowledged by river users as being part of one of the very few quiet stretches along the Wey Navigation. Any increase in development scale will reduce this ambience.

• Traffic Infrastructure Capacity: I OBJECT to the proposed increase from 45 to 60 homes because increased development in the area will create additional traffic movements which existing very narrow roads and the Tannery Lane/A247 intersection cannot safely support.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4349  Respondent: 15326657 / Janet Davie  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Garlic’s Arch (site no. A43)

- **General Infrastructure**: I OBJECT to development at Garlick’s Arch because there is insufficient local infrastructure to support the development, including utilities, social amenities, schooling, public transport, and medical facilities.
- **Scale of development**: I OBJECT to inclusion of sites for travelling/show people pitches because the site is less than 500 houses and a need has not been established, in contravention of Local Plan Policy H1.
- **Outside current development boundary**: I OBJECT since this development lies outside the existing housing outline of the village. It represents ribbon development, loss of green belt land, and creeping development between Send, Woking, and Guildford.
- **Use of Green Belt land**: I OBJECT because there are no special or exceptional circumstances identified which justify its removal from the Green Belt
- **Traffic Infrastructure Capacity**: I OBJECT to the proposed development because this would generate significant new traffic movements that surrounding roads cannot accommodate.
- **Flooding**: I OBJECT to development at Garlick’s Arch because the area is classified by the Environment Agency as being in a higher flood risk area (zone 2) than the Council’s own assessment and has flooded many times in recent years. Therefore the Council’s own assessment is invalid and the site must not be developed.
- **Environment**: I OBJECT to the destruction of the Ancient Woodland on the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4350  Respondent: 15326657 / Janet Davie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Land around Burnt Common Warehouse (site no. A58)

- **Outside current development boundary**: I OBJECT since this development lies outside the existing development outline of the village. It represents ribbon development, loss of green belt land, and creeping development between Send and Guildford.
- **Use of Green Belt land**: I OBJECT because there are no special or exceptional circumstances identified which justify removal of the Green Belt
- **Industrial use**: I OBJECT to the proposed industrial development of a minimum of 7,000 sq. m at Garlick’s Arch because there is insufficient justification contained within the draft Local Plan plus it is not a sustainable
development. It is removed from the major population centres in Guildford and Woking necessitating a large increase in public transport services and/or major additional traffic movements for staff travel and business logistics. If there is a need for 7,000+ sq. m of industrial space within the Borough it should be located at Slyfield where there is a 40ha site available, where transport link upgrades are already under way, and where it would be largely welcomed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2766  Respondent: 15326657 / Janet Davie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write to object to Guildford Borough’s Draft Local Plan as detailed below. Please show my comments to the Planning Inspector who will decide about the Local Plan. Please also acknowledge receipt of this letter.

1. General Evidence and Policies

• **Housing Requirement**: **I OBJECT** to the figure of 654 houses required each year between 2015 and 2034 as being too high. Guildford Borough Council will not publish details regarding how this figure was derived. It therefore remains impossible to support the sudden increase in housing numbers from previous annual figures of 322.

• **Inset Green Belt land**: **I OBJECT** to the proposed inset of Send Business Park from the Green Belt (Green Belt Policy 2 at Paragraph 4.3.15) because

  This is acknowledged by river users as being part of one of the very few quiet stretches along the Wey Navigation. It must be protected from further development.

  The site contains an Area of High Archaeological Potential (AHAP – reference 2003 Guildford Local Plan) which requires significant protection to be continued.

  There are no special or exceptional circumstances identified which justify removal of the Green Belt status.

  Developments in the area will harm the open aspect of the area and views associated with the Wey.

  Access to the site is along very narrow roads which can neither safely support existing traffic nor the additional traffic to be expected both during site development and subsequent use.

• **Process**: **I OBJECT** to the failure of Guildford Borough Council to allocate housing development proposals evenly among its constituent parts, instead focusing disproportionate development within Send Parish.

• **Process**: **I OBJECT** to the failure of Guildford Borough Council to recognise and act on the large number of objections relating to proposals for Send and made during the 2016 consultation activity.

2. General Policies relating to Send Parish. Sites (A42, A43, A58)
• **Traffic levels and associated environmental issues.** I **OBJECT** to the proposed significant developments in Send because these will increase both traffic movement levels throughout the Parish and the level of traffic related pollutants over wide areas in and surrounding the Parish.

• **Housing Numbers:** I **OBJECT** to the scale of development within Send because the increased number of houses proposed (500 + 2 traveller pitches + 8 Traveller/Showman Pitches/Plots) will grow the number of houses in Send by 25%. This is incompatible with maintaining Send’s current rural nature and cannot be supported by existing infrastructure, including education and medical facilities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/986  **Respondent:** 15326753 / Jim Henley  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Ripley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ) , is Sound? ( ) , is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to register the strongest possible objections to the Draft Local Plan for Ripley and the surrounding area. In particular I raise the following points:

1. From the documents I have read on your web site the proposed developments are likely to at least treble the number of houses in the area. This is completely disproportionate and will have a hugely negative impact on the area as a whole.

2. The roads in the area at peak times are unable to cope with the current volume of traffic. This includes the main roads (M25 and A3) as well as the minor roads, many of which are little better than lanes. Most houses now boast at least two cars, and given no train station exists in Ripley and public transport is poor at best, people will be forced to take to the roads for shopping, commuting etc. Not only will this result in gridlock in the immediate area, but the areas around local stations will become impossible for residents living nearby as people park to facilitate travelling to and from work.

3. The impact on the environment in terms of pollution from the increased number of vehicles will be extremely detrimental to the health of all, but in particular the young and elderly.

4. Increased traffic will increase the number of accidents in the area, with the greatest impact likely to be on pedestrians and cyclists. Many roads and lanes have no pedestrian walkways, and the increase in cycling in the area (partly due to the growth of the hobby in general but in particular due to the attraction of the Olympic/Prudential Surrey 100 route) will endanger the lives of those most vulnerable to road traffic accidents.

5. The local infrastructure will simply be unable to cope with the increased number of people living in the area, not just in terms of roads but also local public transport, GP surgeries, A&E departments, schools etc to name but a few. In general this has already happened in much of the south east but the extreme increase in housing the Local Plan proposes in such a small area means that local services will not be able to cope effectively.

6. The lack of protection for the greenbelt is a concern. While many people enjoy living in an area with views of green fields and woodlands, the green belt has much more important roles. It is the natural habitat for a huge number of native species, many of which are already in danger and struggle to exist alongside man. In addition, the greenbelt represents the lungs around London and major built up areas such as Guildford. It helps to cleanse the air and keep the ecosystem in balance. The longer term effects of upsetting that balance are already apparent in Global Warming/Climate Change, and
huge local projects such as that proposed will only increase environmental problems and ensure we continue down the same slippery slope.

I have no problem with increasing housing locally per se, but it needs to be done in a much more controlled way ensuring everything affected by that increase moves forward coherently. The Draft Local Plan is not coherent and in my view represents a knee jerk reaction to the requirement of central government to increase housing. The knock on effects of that increased housing have not been addressed, but most certainly should be.

Thank you for taking the time to read this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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<tr>
<td>I object to a totally unrealistic number of houses for the country lanes to absorb.</td>
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<td>I object to the 20 16 Draft Local Plan as it has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable.</td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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<td>I object to the removal of villages from the Green Belt.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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Comment ID: PSLPP16/3268  Respondent: 15326785 / James Hampton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners’ views, or the costs involved in improving the infrastructure, currently out side their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/987  Respondent: 15326817 / Peter Jennings-Giles  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send Marsh/ Burnt Common

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I moved to Send Marsh 25 years ago with my wife and young family attracted by it’s rural qualities and subsequently we enjoyed the fact that it (and other local villages) benefited from protection from major redevelopment by being protected from major development by virtue of protection of the green belt. I understood that due to legislation passed shortly after WW2 that the green belt boundaries would remain intact in perpetuity.

I OBJECT to the removal of 15 villages, including Ripley and Send, from the green belt. This will lead to wholesale, and often inappropriate developments.

I OBJECT to the fact that GBC have not followed the correct process for Send and Ripley developments. Any significant changes to the 2014 proposals, such as the proposal development of Garlicks Arch, should have required another full consultation, which did not happen. This invalidates the whole process.

I OBJECT to the fact that the first notification I received of the proposed changes to include development of Garlicks Arch was as in early June via a leaflet distributed by a concerned neighbour and not via Guildford Borough Council.
I OBJECT to the fact that GBC have failed to provide sound evidence in terms of the Employment Land Needs Assessment which shows that industrial space at Burnt Common IS NO LONGER NEEDED.

I OBJECT to Policy A43.30 the proposed development of Garlicks Arch designated for 400 houses and an industrial estate. This is a new site not included in the Regulation 18 draft and has NOT been consulted on previously. It is not only permanently protected green belt but also a site of ancient woodland with some trees planted in the 16th century.

I OBJECT to policy A43.30 the development of new four way interchange onto the A3 which would mean that narrow Send Road (A247) would be the main route for traffic leaving the M25 and A3. It is already crowded and vulnerable to traffic jams. Further traffic from this development would result in permanent gridlock. It simply would not work.

I OBJECT to policy A44 which would see 40 homes and two travellers' pitches on land west of Winds Ridge and Send Hill. This was again a NEW site NOT included in 18 draft and therefore has NOT been consulted on previously. Once again this is Green Belt land partly containing unsafe landfill. Access is by a narrow lane which could never take the volume of traffic that would ensue from traveller's pitches.

I OBJECT to the fact that the Local Plan takes no account of schools, doctors surgeries and roads that are already operating at full capacity. Another 4000 houses in this area with a conservative estimate of a further 8000 cars would be catastrophic.

Please take into consideration the genuine concerns and objections of people living in these areas who would be seriously detrimentally affected by these proposals and reconsider your proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5443  Respondent: 15326817 / Peter Jennings-Giles  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the fact that the first notification I received of the proposed changes to include development of Garlicks Arch was as in early June via a leaflet distributed by a concerned neighbour and not via Guildford Borough Council.

I OBJECT to the fact that GBC have failed to provide sound evidence in terms of the Employment Land Needs Assessment which shows that industrial space at Burnt Common IS NO LONGER NEEDED.
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5445  Respondent: 15326817 / Peter Jennings-Giles  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a
| Comment ID: | PSLPS16/5447 | Respondent: | 15326817 / Peter Jennings-Giles | Agent: |
| Document: | Proposed Submission Local Plan: strategy and sites 2016 / Policy A44 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to policy A43.30 the development of new four way interchange onto the A3 which would mean that narrow Send Road (A247) would be the main route for traffic leaving the M25 and A3. It is already crowded and vulnerable to traffic jams. Further traffic from this development would result in permanent gridlock. It simply would not work.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPP16/10879 | Respondent: | 15326817 / Peter Jennings-Giles | Agent: |
| Document: | Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to policy A44 which would see 40 homes and two travellers' pitches on land west of Winds Ridge and Send Hill. This was again a NEW site NOT included in 18 draft and therefore has NOT been consulted on previously. Once again this is Green Belt land partly containing unsafe landfill. Access is by a narrow lane which could never take the volume of traffic that would ensue from traveller's pitches.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Attached documents:

Comment ID: PSLPP16/10874  Respondent: 15326817 / Peter Jennings-Giles  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I moved to Send Marsh 25 years ago with my wife and young family attracted by it’s rural qualities and the fact that it benefited from protection from major redevelopment by the green belt. I understood that the green belt boundaries would remain intact in perpetuity.

I OBJECT to the removal of 15 villages, including Ripley and Send, from the green belt. This will lead to wholesale, and often inappropriate developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1367  Respondent: 15326817 / Peter Jennings-Giles  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the fact that GBC have not followed the correct process for Send and Ripley developments. Any significant changes to the 2014 proposals, such as the proposal development of Garlicks Arch, should have required another full consultation, which did not happen. This invalidates the whole process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1496  Respondent: 15326849 / Michael Hoad  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

1567
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I was born and brought up in Guildford and am still a regular visitor to the Borough, not only to visit many friends, but also to enjoy walking in the countryside and through the historic villages which are the Borough’s heritage.

I would like to raise objections to the Borough Councils proposed Local Plan.

I object to the fact that the majority of housing is proposed to be built on Green Belt land, rather than on available brown field sites, and I specially object to the proposed removal of the former Wisley Airfield site from the Green Belt when no exceptional circumstances have been given for doing so.

I strongly object to the continued inclusion of the Wisley Airfield site in the plan when after over a year of consideration, the Council Planning Committee unanimously rejected the developer’s planning application, after the Council’s Planning Officers expressed grave concerns about the proposed development.

The proposed 2,000+ houses proposed for this site would totally swamp the local historic Ockham village with its many listed houses, whilst losing valuable green land.

The roads in the area are extremely narrow, unlit and with no pavements and totally unsuitable to cope with increased traffic. The suggestion that this development would encourage a move to cycling and walking is not realistic due to the isolation of the site – it would without doubt bring about a large increase in private car usage in the area. Car ownership figures would suggest that a 2,000+ housing development could generate 3,000 - 4,000 extra cars (as well as heavy lorries and vans which would service such an estate) adding to an already overcrowded A3 and M25, and creating even higher levels of pollution, which already breach EU limits around the M25 junction. Furthermore, there is little public transport in the area and certainly neither of the local railway stations at Effingham and Horsley could cope with a large increase in passenger numbers or demand for parking.

A look at the map clearly shows why the Green Belt was created – the urban sprawl from London has already reached as far as Cobham, and the Wisley Airfield site is crucial in protecting the Borough from its further advance.

I trust that you will seriously consider removing the Wisley Airfield site from the Local Plan – not only for the many practical concerns raised, but because it risks destroying the very countryside and rural village life which are the very things which make the Borough such a desirable place to live.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I support Guildford Residence Association’s response to the Local Plan and the Project should be in-line with the character
of Guildford town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3272  Respondent: 15326945 / Alex Boden  Agent: 15326945

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to register my feedback on the Guildford Local Plan. I support the Guildford Residents Association (GRA)
response and oppose Guildford expanding by a quarter.

Whilst I accept that there is a need in the UK to build more housing, I feel that the proposals outlined in the Local Plan for
Guildford are excessively large - simply put, the volume of building outlined is too large for the town's infrastructure.

The infrastructure in Guildford is not ready to support such a large-scale development - before adding even one quarter of
the number of properties proposed in the Plan Guildford needs:

- vastly increased capacity on the trains to London for everyone who has to commute to London to work (there are not
  enough jobs in Guildford to support the current population, let alone a massively expanded one);

- a remedy to the issues caused by the A3 (splitting the town in half, with commensurate social effects, causing gridlock in
  the town at rush hour and whenever there is frequently an accident);

- increased crossing points over the river, railway and A3 to make transport easier and unite the town (ideally the A3 and
  the railway should run below ground);

- integrated rail and bus services - there is currently not one single bus running from the mainline station, the main entry
  point for visitors and commuters;

- bus passes which enable local residents to use buses cost effectively, and encourage people not to drive into the centre of
  Guildford;

- proper cycle lanes to and from the station and other key destinations to encourage people out of the cars and reduce the
  volume of traffic on the roads.

I see no progress on any of these items - they should be the number one priority of the council. Any approval of new
housing schemes should be dependent on these issues being addressed. No properly thought through infrastructure -
no houses! The proposed infrastructure additions in the plan - adding stations at Park Barn and Merrow - will exacerbate
the problems experienced by the rest of the existing infrastructure.

And I have not mentioned the issues around unjustified Green Belt development - squandering our greenfield sites in a
single Plan, robbing future generations and destroying one of the main things that makes Guildford unique and attracts
people to live here in the first place.
I expect our councillors to defend Guildford against these plans and to fight for improvements which will benefit existing and future residents, and make our town a UK leader, not a concrete backwater.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/990  Respondent: 15326977 / Jane Gaines  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We would like to object in the strongest possible terms to the various proposed developments in and around the areas of Send and Ripley.

Whilst we are all aware that new homes are needed, the scale and the questionable way in which these developments have been introduced into the planning timetable leads us to believe that the prime concern of the Council is not the welfare of existing residents.

Too much unbalanced development shouts off the list of proposals. If all of these developments were give the green light, the strain on road congestion, schooling and doctors' surgeries would be overwhelming.

The Green Belt is there for a very important purpose. It is not there for Local Authorities to abuse by taking chunks out of it to meet spurious building targets.

All of the proposals the Council have listed are contentious but for our part the A43 Garlicks Arch development is a classic example of the Council’s doubtful conduct by dangling an additional slip-road off the A3 in the hope that will appease the residents.

It will not.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1499  Respondent: 15327073 / University of Surrey (G Q Max Lu)  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. Blackwell distinguishes itself through powerful exceptional circumstances, much more so than the other strategic sites.
2. Blackwell provides the opportunity to address a critical existing infrastructure deficit: access to the West.
3. The University notes the recent Strategic Highways Assessment and points out that Blackwell offers an exceptional opportunity for sustainable transport based on a design focusing on "live here, work here" (with in excess of 10,000 people working between Blackwell and Guildford Town centre).
4. The University regards Policy E2 relating to the location of new employment space and the sequential test to be flawed and recommends that the Research Park be treated in the same way as the Town Centre.
5. The University believes that Blackwell provides unique long term potential and recommends that those parcels not released under this local plan be safeguarded. This would allow the Borough to better satisfy NPPF guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5004  Respondent: 15327073 / University of Surrey (G Q Max Lu)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Blackwell distinguishes itself through powerful exceptional circumstances, much more so than the other strategic sites.
2. Blackwell provides the opportunity to address a critical existing infrastructure deficit: access to the West.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5008  Respondent: 15327073 / University of Surrey (G Q Max Lu)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. The University notes the recent Strategic Highways Assessment and points out that Blackwell offers an exceptional opportunity for sustainable transport based on a design focusing on "live here, work here" (with in excess of 10,000 people working between Blackwell and Guildford Town Centre).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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1. The University believes that Blackwell provides unique long term potential and recommends that those parcels not released under this local plan be This would allow the Borough to better satisfy NPPF guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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1. The University regards Policy E2 relating to the location of new employment space and the sequential test to be flawed and recommends that the Research Park be treated in the same way as the Town Centre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</td>
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1. The University strongly objects to the elements contained within Policy H1 which require that 60% of FTE students be accommodated on Guildford Borough Council, the University and others can work together outside the Local Plan to encourage new entrants to join the rental sector in Guildford through non-affiliated Purpose Built Student Accommodation ("PBSA") and more Private Rental Sector (PRS) housing. As a benchmark the University simply points out that it already provides more accommodation than do 95% of Universities across the nation, it plans to deliver 1,150 new units over the next three years and that it expects to deliver more in future as funds/circumstances permit to support new demand. The PBSA sector in Guildford, on the other hand, is virtually non-existent (c160 units at date). The clause is regarded as divisive, discriminatory, impractical and dangerous.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPP16/10264 | Respondent: 15327073 / University of Surrey (G Q Max Lu) | Agent: |
| Comment ID: | PSLPP16/10271 | Respondent: 15327073 / University of Surrey (G Q Max Lu) | Agent: |
The future development of the town and the University are closely linked and it is clear that their synergetic relationship can create even greater vitality and prosperity for the region. The University is committed to building on this relationship as the economy of the UK moves further towards the opportunities of science and innovation. For such an innovation-based future the Borough will require access to young talent, a sense of vibrancy that is attractive to young people, housing capacity, employment land for the technology, engineering and science sectors, and the infrastructure to help to support these aspects of economic development.

As Vice-Chancellor of the University of Surrey I should like to reiterate the importance of the Local Plan to the future of the Borough and the University and would urge the Council to adopt this plan after careful redrafting of Policy H1.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10272  Respondent: 15327073 / University of Surrey (G Q Max Lu)  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The University and Its Town

The relationship between the University of Surrey and Guildford Borough Council goes back to the early 1960s when the Borough supported its own development by attracting the University of Surrey to relocate to the town.

Today the University and the companies on its Research Park bring £1.7bn of gross added value to the UK each year and directly or indirectly support 17,312 UK jobs, 10,644 of them in Guildford. The University is ranked 4th in the country in the Guardian 2016 and 2017 league Tables and was awarded the University of the Year Status by The Times/The Sunday Times in 2016. The wholly-owned Surrey Sports Park attracts international teams and high-profile events and is appreciated by local residents who pay well in excess of 3/4 million visits to the park each year.

The University, the Research Park companies, the Royal Surrey County Hospital and Guildford Business Park are located in an area of roughly a square mile to the west of Guildford Town Centre. This square mile covers less than 1% of Guildford Borough but generates around 45% of the Gross Value Added of the Borough. The experience of the many staff working in the square mile and the University students is affected by housing and infrastructure deficits and the University's plans and this response reflect that context.

The underpinning need for the local Plan is clear:

• Population growth in this area is rapid and this will continue
• The UK is already in housing crisis, with the younger and future generations particularly badly affected
• The housing crisis is particularly serious in the South East and in this Borough
• The economy must be allowed to grow to deal with the country's debt burden and population growth
• To enable economic and housing growth, infrastructure deficits must be tackled
• Guildford is an integral part of the dynamic fast growth area of London and the South.

It cannot distance itself from that growth and cannot avoid dealing with the consequences of it.

The University is, of course, acutely aware both of the social costs of growth, and of the infrastructural deficits that our town has to contend with. Investments by the University in student accommodation over the past ten years are approaching £130m (including £85m in new accommodation); a further sum of around £75m is due to be spent delivering 1,150 new units over the next three years and further accommodation will be built to support new demand as funds permit.

The University is also all too familiar with local infrastructural deficits and has itself had to contend with well-documented traffic and parking issues and restrictions. The University's own investment in transport infrastructure and on public transport subsidies has cost many millions over the past ten years, not least for the new Egerton Road Junction. It has always been known that this junction was just part of a more comprehensive solution which would need to include access to the West through a road across Blackwell Farm to the A31. That new road infrastructure would benefit the University, the Research Park, the Hospital and Guildford town itself, and the development of Blackwell Farm provides an excellent opportunity to deliver and fund those essential improvements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3273  Respondent: 15327073 / University of Surrey (G Q Max Lu)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Local Plan marks a defining point for Guildford and its future. The University's involvement with this plan is three fold:

• As civic partner, the University benefits from and contributes to the health and prosperity of the town

• As a major employer the University and its staff are materially affected by the existing housing and infrastructure deficits

• As a land owner the University is planning to develop Blackwell Farm to support housing, infrastructure and employment

The University has submitted a formal and comprehensive response to the consultation through its planning advisors Terence O'Rourke. This letter seeks to reinforce the most material points of that submission. These are - the University is supportive of the Local Plan process and is generally supportive of the draft. A summary of the main comments is attached as an appendix to this letter.

The future development of the town and the University are closely linked and it is clear that their synergetic relationship can create even greater vitality and prosperity for the region. The University is committed to building on this relationship as the economy of the UK moves further towards the opportunities of science and innovation. For such an innovation-based future the Borough will require access to young talent, a sense of vibrancy that is attractive to young people, housing
capacity, employment land for the technology, engineering and science sectors, and the infrastructure to help to support these aspects of economic development.

As Vice-Chancellor of the University of Surrey I should like to reiterate the importance of the Local Plan to the future of the Borough and the University and would urge the Council to adopt this plan after careful redrafting of Policy H1.

The relationship between the University of Surrey and Guildford Borough Council goes back to the early 1960s when the Borough supported its own development by attracting the University of Surrey to relocate to the town.

Today the University and the companies on its Research Park bring £1.7bn of gross added value to the UK each year and directly or indirectly support 17,312 UK jobs, 10,644 of them in Guildford. The University is ranked 4th in the country in the Guardian 2016 and 2017 League Tables and was awarded the University of the Year Status by The Times/The Sunday Times in 2016. The wholly-owned Surrey Sports Park attracts international teams and high-profile events and is appreciated by local residents who pay well in excess of 3/4 million visits to the park each year.

The University, the Research Park companies, the Royal Surrey County Hospital and Guildford Business Park are located in an area of roughly a square mile to the west of Guildford Town Centre. This square mile covers less than 1% of Guildford Borough but generates around 45% of the Gross Value Added of the Borough. The experience of the many staff working in the square mile and the University students is affected by housing and infrastructure deficits and the University's plans and this response reflect that context.

The underpinning need for the Local Plan is clear:

- Population growth in this area is rapid and this will continue
- The UK is already in housing crisis, with the younger and future generations particularly badly affected
- The housing crisis is particularly serious in the South East and in this Borough
- The economy must be allowed to grow to deal with the country's debt burden and population growth
- To enable economic and housing growth, infrastructure deficits must be tackled
- Guildford is an integral part of the dynamic fast growth area of London and the South It cannot distance itself from that growth and cannot avoid dealing with the consequences of it.

The University is, of course, acutely aware both of the social costs of growth, and of the infrastructural deficits that our town has to contend with. Investments by the University in student accommodation over the past ten years are approaching £130m (including £85m in new accommodation); a further sum of around £75m is due to be spent delivering 1,150 new units over the next three years and further accommodation will be built to support new demand as funds permit.

The University is also all too familiar with local infrastructural deficits and has itself had to contend with well-documented traffic and parking issues and restrictions. The University's own investment in transport infrastructure and on public transport subsidies has cost many millions over the past ten years, not least for the new Egerton Road Junction. It has always been known that this junction was just part of a more comprehensive solution which would need to include access to the West through a road across Blackwell Farm to the A31. That new road infrastructure would benefit the University, the Research Park, the Hospital and Guildford town itself, and the development of Blackwell Farm provides an excellent opportunity to deliver and fund those essential improvements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | SQLP16/1315 | Respondent: | 15327073 / University of Surrey (G Q Max Lu) | Agent: | Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents |
Local Plan Document & Consultation

The Local Plan marks a defining point for Guildford and its future. The University's involvement with this plan is three fold:

- As civic partner, the University benefits from and contributes to the health and prosperity of the town
- As a major employer the University and its staff are materially affected by the existing housing and infrastructure deficits
- As a land owner the University is planning to develop Blackwell Farm to support housing, infrastructure and employment

The University has submitted a formal and comprehensive response to the consultation through its planning advisors Terence O'Rourke. This letter seeks to reinforce the most material points of that submission. These are:

1. The University is supportive of the Local Plan process and is generally supportive of the draft A summary of the main comments is attached as an appendix to this letter

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/991  Respondent: 15327137 / Sally Edwards  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

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Comment ID: PSLPS16/1500  Respondent: 15327137 / Sally Edwards  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to new sites (Garlicks Arch) being introduced as an after thought when it was not even considered in the previous plan. A slip road on the A3 at Burnt Common has been added to the Draft Local Plan without Highways England consent.

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Attached documents:

Comment ID: PSLPP16/3274  Respondent: 15327137 / Sally Edwards  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to a totally unrealistic number of houses for the country lanes to absorb.

I object to the 2016 Draft Local Plan as it has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable.

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Attached documents:

Comment ID: PSLPP16/3277  Respondent: 15327137 / Sally Edwards  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/3276  Respondent: 15327137 / Sally Edwards  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

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Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners’ views, or the costs involved in improving the infrastructure, currently out side their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

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Attached documents:

Comment ID: PSLPA16/992  Respondent: 15327201 / Sam Philps  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Attached documents:

Comment ID: PSLPS16/1501  Respondent: 15327201 / Sam Philps  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Attached documents:

Comment ID: PSLPP16/3279  Respondent: 15327201 / Sam Philps  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

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Attached documents:

Comment ID: PSLPP16/3282  Respondent: 15327201 / Sam Philps  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of villages from the Green Belt.

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Comment ID: PSLPA16/993  Respondent: 15327521 / Dion Slattery-Hill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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Comment ID: PSLPS16/1502  Respondent: 15327521 / Dion Slattery-Hill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/3296  **Respondent:** 15327681 / Lukesz Romoszewslai  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object to a totally unrealistic number of houses for the country lanes to absorb.

I object to the 2016 Draft Local Plan as it has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/3298  **Respondent:** 15327681 / Lukesz Romoszewslai  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object to the removal of villages from the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/3297  **Respondent:** 15327681 / Lukesz Romoszewslai  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
As resident home owners living in West Horsley we have reviewed the contents of the Guildford Borough Proposed Submission Local Plan: strategy and sites document and wish to register our objections with regards to: Green Belt and the Countryside (Policy P2) and Surrey Hills Area of Outstanding Natural Beauty (AONB) (Policy PI):

**OBJECTIONS/CONCERNS:**

1. We object to the village's removal from the Green Belt by insetting and extending the 2003 Local Plan settlements Area As such the Green Belt & Countryside Study is flawed.
2. We feel that West Hosley's defined Settlement Area boundaries (ref 2003 Local Plan) DO NOT need to be
3. In the Key Evidence document "Guildford Borough Economic Strategy 2013 2031" makes no case for locating large numbers of homes in West and East Horsley or neighbouring villages, therefore, why are changes been considered?
4. 13,800 new homes over the Plan Period 2013 to 2033 is too high and unsustainable in Guildford's villages. 
5. The current village size of East and West Horsley is not adequate to support an increase in homes. The development of 385 homes on the 4 proposed sites are at much higher densities than currently exist in the village settlement and will be totally out of character with the existing mix of different housing styles, historic buildings and layout of the village and, therefore, we feel this is inappropriate development within the Green Belt. The West Horsley Parish Council and Surrey Community Action Housing Survey: May 2014, identified a limited need...
for some 20 affordable homes for local people who want to remain in the village, ie for young people and for elderly people who wish to downsize to a smaller home.

6. Access to essential facilities, such as road and transport infrastructure, parking, medical facilities, schools, waste water infrastructure, sewage infrastructure would be greatly impacted if development of the size currently proposed is granted.

On top of the Local Plan proposals there are other planning applications that require consideration/objection eg. Land adjacent Cranmore Lane, including Goodhart-Rende! Community Hall and the development of Bell & Covill which all impact on the village settlement area.

Please give due consideration of our objections/concerns when reaching a decision.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLP16/6671  
**Respondent:** 15327745 / T S Pilkington and C A Gray  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Access to essential facilities, such as road and transport infrastructure, parking, medical facilities, schools, waste water infrastructure, sewage infrastructure would be greatly impacted if development of the size currently proposed is granted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLP16/6668  
**Respondent:** 15327745 / T S Pilkington and C A Gray  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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We feel that West Hosley's defined Settlement Area boundaries (ref 2003 Local Plan) DO NOT need to be extended.

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On top of the Local Plan proposals there are other planning applications that require consideration/objection e.g. Land adjacent Cranmore Lane, including Goodhart-Rendel Community Hall and the development of Bell & Covill which all impact on the village settlement area.

Please give due consideration of our objections/concerns when reaching a decision.
The roads in Surrey are already gridlocked with traffic.

The schools in Guildford are close to bursting.

The hospital will have to service yet more patients when it is already struggling to cope with the patients they currently have.

Doctors surgeries are already over stretched.

Local resources can barely cope with the current population.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I would like to object to the proposed mass development in Surrey and on greenbelt for the following reasons:

We should be protecting what little green open spaces we have, not building on them!
Comment ID: PSLPS16/1518  Respondent: 15327841 / Peter Jenkins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am objecting to the proposed Blackwell Farm Estate Planning on several grounds. Besides the obvious ones of blighting the exceptionally beautiful countryside where Blackwell Farm is situated, it is also on a flood plane that becomes obvious after periods of heavy rain. The rain goes down the slopes of the Hogs Back and ends up on the fields in front of Blackwell House. Completely unsuitable for construction.

Guildford has very high employment so the Government and Council would be better of investing money in the areas where employment was low and growth needed. Guildford has become very much a town where the University is taking over from the residence and the town itself in its attempts for ever further expansion and the vast profit this will give them. The wishes of its residence are of no importance to them. It is only about their profits.

The Council recived over 20,000 objections from the residence of Guildford, nearly one-third of the residence of Guildford. Just how many objections does it take for the Council to bother to listen to its residence? It is clear that the influence of the University over-rides the wishes and common sense of its residence.

However, the most serious problem is the roadways. Farnham Road and the Hogs back is at a standstill every morning and most evenings. The traffic down to the A31 is always extremely heavy. The thought of many hundreds, or thousands more vehicles on the Farnham Road is obsured. The road into Guildford is just one lane in each direction and more vehicles would not be pratical. With Guildford town centre reducing its access at Bridge Street, Walnut Tree Close possibly restricting access, everything would result in gridlock. Any access into the Blackwell Farm Estate should be taken from the A31 near the hospital roundabout and at Wood Street. The Hogs Back and Farnham Road cannot take even more vehicles.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/999  Respondent: 15327873 / Susan Richards  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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2. Sites in East and West Horsley

I OBJECT in particular to including Sites A36-41 (East and West Horsley). This is a back-door way to create a mega-village – essentially, a soulless new dormitory town.

Whatever their merits as development sites, the 6 Horsley sites should not be considered individually but for their cumulative impact on the contiguous villages of East and West Horsley.

Building 533 new houses on these 6 sites, plus at least another 90 on small sites is (a) excessive in absolute terms and (b) disproportionate relative to the rest of the borough. It will destroy the rural character of these communities.

Under the plan, rural West Horsley will take 35% of new homes, urban Ash and Tongham 16% and Guildford urban area only 11%. The total number of homes in West Horsley will increase by 35%, which is disproportionate when measured against the overall increase in housing across the borough and particularly in Guildford town. If the Council have justifiable reasons to transform a particular community so radically, the plan should present a case rather than putting forward site proposals as a fait accompli.

These sites will put unsustainable strain on local facilities and infrastructure, including public transport, parking, schooling, medical facilities, sewage, surface drainage and shops. For instance:

- Thames Water have advised the Council that the current wastewater network will not cope and that the foul drainage system all the way to the treatment works North of Ripley will need to be upgraded.
- Guildford Council’s Education Review says “expansion options may need to be considered for primary” education in the Horsley area within the first 5 years of the plan, but Surrey County Council have no plans to do so. The Raleigh School is already full. The private Glenesk and Cranmore schools are also at or near to full capacity. The suggestion that schools in Ripley can be used contradicts the plan’s stated intention to reduce traffic on the A3 and strategic aim that primary schools should be within walking distance.
- The plan’s Infrastructure Schedule (Appendix C) imagines an “East Horsley and West Horsley traffic management and environmental improvement scheme between 2019 and 2023 by Surrey CC” but gives no details. This scheme is just wishful thinking. The proposed housing can only harm the local environment, not “improve” it.

The density of new housing on the 6 Horsley sites is inappropriate, being greater than anywhere in the locality at present.

Sites situated on the periphery of existing development in the Horsleys encroach on surrounding open fields and require the extension of settlement boundaries for which the plan presents no arguments. Contrary to NPPF paragraph 79, this will contribute to creeping urbanisation by attenuating the Green Belt corridors separating the Horsleys from neighbouring settlements.

Collectively, these 6 sites militate against NPPF paragraph 81’s encouragement of access to the Green Belt and its amenity and recreation value. This has been a success story in the Horsleys, with the creation of an amenity wood and community garden, the purchase of adjacent fields (on the eastern side of Ockham Road North) by local residents in order to preserve their open aspect, well-maintained pitches for local football and cricket clubs, public tennis courts, open space for a high-quality campsite (at Waterloo Farm) used by many foreign tourists and the approval of plans for a “Theatre in the Woods” – making West Horsley the only village in Surrey with an opera house. The open nature of West Horsley determined that a long portion of the 2012 Olympic cycle races passed through the village. This route has since been adopted by cyclists as a permanent asset, including the annual Prudential cycle race. These and future examples of “positive planning” depend on
protecting the Green Belt to maintain the openness and attractiveness of the local landscape and avoiding the urbanisation and traffic congestion that Sites A36-41 will bring.

By surrounding Waterloo Farm campsite with 120 new houses, Policy A40 on land to the North of West Horsley will make this rural tourism amenity unviable. This may accord with developers’ plans, since the site would then be vulnerable to infilling with yet more housing.

Site A40 is subject to an unacceptable flood risk from a combination of a high groundwater table and the lack of surface water run-off. This is flat, clay land on the downhill side of the Horsleys where floodwater from new development will accumulate and back up onto existing properties nearby. I can provide photographs proving how badly these fields already flood at present. These problems will only get worse with the increase in extreme weather events associated with climate change. The “appropriate mitigation” suggested in Policy A40 exists only as an abstract notion. It should not overrule the need for Green Belt “exceptional circumstances”.

Policy A40 underestimates the problems of safe access and egress. Firstly, Ockham Road North was closed for several weeks in 2014 because of flooding, and still floods regularly. Secondly, access problems are not confined to flooding and are not addressed by the proposal to extend the existing 30mph zone past the site entrance. Repeated attempts made by Ockham Road North residents to extend this zone have been turned down by the local authorities, Highways England and Surrey Police, even though data collected in 2015 show that traffic has doubled over the last 15 years and that the average speed in the 40mph section of this road is 52mph, with maximum recorded speeds of over 80mph. No traffic calming measures have so far been achieved. Additional housing will add to several hazards along this stretch of road, including:

- Its use by pedestrians, especially children (using the Raleigh and Glenesk schools and catching school buses to Guildford and Howard of Effingham), pensioners living in the string of bungalows at the northern end of the road, and visitors from the Waterloo campsite who are unfamiliar with the area.
- The existence of a narrow footpath on only one side of the road in any one spot. The layout means that walking half a mile between Green Land and East Lane requires crossing the road twice.
- The road’s increasing use by recreational cyclists (see above).
- Its winding nature, poor sight lines (especially when interrupted by summer vegetation) and dangerous, concealed driveways. Most of these were built in the 1930s. Some have been widened but many are too narrow for modern traffic. Since a deep ditch runs along most of the road, vehicles have to swing out dangerously when entering or leaving.
- The prospect of additional traffic, including 19,000 HGV movements (90 a day over a long period) if Surrey County Council approves the Drift Golf Course’s planning application to re-landscape its site using bulk waste transported from London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1519  Respondent: 15327905 / Julia Cook  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
SITES1. Green Belt sites

I OBJECT to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development, however, it does identify the principle of development and uses.” This ignores the tens of thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. This amounts to a war of attrition by the Council in conjunction with developers, since many busy residents are sick and tired of repeating the same comments to deaf ears. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. Some residents have concluded that commenting is a waste of time.

All Green Belt sites should be removed from the plan until “exceptional circumstances” for development are proven, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1520  Respondent: 15327905 / Julia Cook  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3. Three Farms Meadow site

I OBJECT to the re-inclusion in the plan of Policy A35 (land at Three Farms Meadow, alias the former Wisley airfield, Ockham). Following a huge public outcry, Guildford Planning Committee have unanimously rejected a recent planning application for precisely this development on 14 separate grounds. This deceived many residents into thinking that it has been defeated. Scandalously, the site had been reinserted into the new draft local plan published just 24 hours before the planning decision – a clear signal to the developers to try again.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3320  Respondent: 15327905 / Julia Cook  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY D4 - Development in urban areas and inset villages

I OBJECT. This does not address any of the obvious practical issues already touched on above:

- The plan envisages that 40% of homes built will be “affordable”, but this does not provide any accommodation for low-paid workers, for example, those on the minimum wage, who cannot afford to buy so-called “affordable” homes or pay an “affordable” rent. There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low-paid workers such as those employed in the retail, warehousing and distribution sectors (all of which this plan aspires to expand).
- The number of homes planned in the urban area is too low. There is a glaring need for regeneration in many urban areas, but this is ignored in favour building homes on green-field sites instead. This will not address urban housing needs. It is also unsustainable, since building outside the town does disproportionate harm to road traffic, air quality and overstretched infrastructure.
- The plan envisages a large expansion of the traditional “bricks and mortar” retail sector, but this is a sector in rapid and continuous decline.
- All the stated policy aims for “inset” villages will be negated by the excessive weight of new housing development proposed which would radically change their character forever. Against this disruptive background, it is barely relevant to talk about preserving views!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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POLICY E1 - Meeting employment needs

I OBJECT because:

- The evidence base is unreliable;
- There is unclear differentiation between B class uses;
- Only high value-added business uses, contributing to a modern “knowledge economy”, are desirable, not low-grade, low-employment warehousing which is also land hungry;
- Industrial and commercial businesses must be concentrated in the urban area or existing business parks (e.g. Slyfield) not in the rural environment which the infrastructure is unable to support;
- The rural environment must support micro- or high-tech businesses, agricultural industries, and tourism, and these sectors must not be damaged by general industrial development which is inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E2 - Location for new employment floor space

I OBJECT. It would be more sensible to confine all new office and research and development (use Class B1a and B1b) floor space to Guildford town centre. I oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3315  Respondent: 15327905 / Julia Cook  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E3 - Maintaining employment capacity and improving employment floor space

I OBJECT. The policy of resisting change of use from B1a to residential flies in the face of positive property market solutions for the regeneration of brownfield land and is contrary to national Government policy, recently reconfirmed, which permits changes of use from B1a (offices) to C3 (residential).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3316  Respondent: 15327905 / Julia Cook  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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POLICY E4 - Surrey Research Park

I OBJECT. The Council are required by the NPPF to facilitate commercial science and technology clusters. But, as with Policies H1 and E2 above, this policy seems to be dictated more by the ambitions of Surrey University than the public interest. In an extremely tangled sentence, it says that the Research Park will be “protected for business use… in any science… that is complementary to the activities of the University of Surrey.”

This fails to distinguish adequately between the University’s public role as a state-funded, academic institution and its private, financial interest in profit-making business spin-offs. It ignores enterprises that might be commercial rivals of the University. And it fails to consider the public harm done by turning the Research Park into a larger Business Park, such as the loss of Green Belt social and environmental capital.

B1b should be the primary use class for the Research Park and applications for B1a should be resisted given the danger of diluting the core purpose and reputation of the park. The inclusion of B1c uses is inappropriate and unnecessary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/3317</th>
<th>Respondent: 15327905 / Julia Cook</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E5 - Rural economy

I OBJECT. Use of rural areas for town centre uses without applying the sequential approach is against the principles of localism that require local people to be consulted and heeded, not ignored. Villages need protecting in terms of both design and scale.

Most of the economic activities listed in 4.4.44 depend on maintaining the rural character of our villages which would be endangered by the wholesale “insetting”, boundary expansion and house building proposed in other parts of the plan. This applies also to new and projected enterprises in the Green Belt (e.g. Grange Park Opera’s Theatre in the Woods in West Horsley, which requires a protected, rustic setting to be a success, not housing estates and congested roads). Policy E5 is incompatible with the high housing numbers proposed.

Previous commitments to improved high-speed broadband and mobile phone coverage have now been diluted, despite general support. This disregards the responses from the 2014 public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E8 - District centres

I OBJECT to the proposal that sites “on the edge” of District Centres should be considered for retail developments. This is another Trojan horse policy, allowing retail hubs to be vastly expanded in order to smooth the way for vast new housing estates outside in the countryside (e.g. to meet the “everyday shopping and service needs” of the roughly 1,500 people living in the 600 new homes planned for the Horsleys).

This is a case of back-to-front priorities. Expanded local retail hubs are being proposed in order to justify more housebuilding in the villages, and in a forlorn attempt to mitigate the serious traffic and infrastructure problems this will bring. The Council have no business preparing the way for new supermarkets in the Green Belt. Rural retail capacity should be left to local demand.

The policy proposes not a single measure to support existing rural shops and services that are the lifeblood of village communities, e.g. using business rates and other levers at the Council’s disposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3319  Respondent: 15327905 / Julia Cook  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E9 - Local centres

I OBJECT (for the reasons given under Policy E8 above) to the proposal for retail development adjacent to the 6 rural centres, and sites on the edge of designated centres. This is creeping urbanisation, damaging to the Green Belt and to Guildford town revival as a thriving urban hub. It will contribute to local urban decay and depopulation, just as expansion of the suburbs did to mid-20th century London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3304  Respondent: 15327905 / Julia Cook  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H1 – Homes for all

I OBJECT. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set any rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to de-humanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and underused surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Overprovision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3305  Respondent: 15327905 / Julia Cook  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H2 – Affordable homes

I OBJECT. “Affordable” homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that these homes will remain well beyond most people’s means and that starter homes will not become available for local people.
In addition, the viability clause (4.2.40) means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. It is a get-out-of-jail-free card for developers that will sacrifice countryside for no local benefit.

I question the assumptions that seem to underlie this policy: that people have a right (rather than a legitimate aspiration) to own a home; that they should be encouraged to live locally (contradicting the Government’s policy of encouraging labour mobility and development in poorer regions, where homes are cheaper anyway); that increasing local house-building will reduce overcrowding and congestion (rather than simply suck more people into the borough); and that it will stem the rise in house prices (even though 13,860 new homes will be a drop in the ocean, given that prices are determined by an infinite demand-pull from London, whose population is increasing by 100,000 a year, and by the currently low cost of capital for overseas and other buyers). The weak mechanisms proposed in the plan might influence the market in a more remote part of the UK, but not here.

This policy’s version of “affordability” is just a smokescreen for pushing through more development generally.

Building more homes in Guildford cannot increase real affordability given the overhang of the London market.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3306  Respondent: 15327905 / Julia Cook  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H3 – Rural Exception Homes

I OBJECT. This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix”, this can include “market” housing – i.e. normal commercial development which in Guildford usually means large executive homes. This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3321  Respondent: 15327905 / Julia Cook  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
POLICY I1 - Infrastructure and delivery

I OBJECT. Most of the borough’s infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. Yet this plan’s commitment to building housing estates across the Guildford countryside will mean either major infrastructure investment that no-one is prepared to pay for or else a catastrophic and simultaneous collapse in transport, educational, medical, energy, water and communications services.

The plan targets greenfield sites – requiring heavy infrastructure investment – in order to generate CIL income necessary to meet an infrastructure shortfall that is already serious. This is not sensible. The current draft CIL scale also encourages development on greenfield sites rather than brownfield.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing infrastructure needs in this area is inadequate, identifying only the tip of an iceberg of existing congestion. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that involve demolishing property and road-widening in residential areas to solve the resultant congestion. The A3 improvements are not guaranteed to take place but they are being used to justify removing large areas from the Green Belt before detailed traffic assessments have taken place. These detailed investigations are being deferred until the planning application stage and will be left to developers to prepare. If a site then proves to be unsustainable its Green Belt protection will have been lost for no reason and unsuitable development will take place by a more insidious process.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritising greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognising this as a key issue, the plan is based on a wing and a prayer.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3322  Respondent:  15327905 / Julia Cook  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY I2 - Supporting the Department of Transport’s “Road Investment Strategy”

I OBJECT. This policy is too vague and optimistic. Decisions by Highways England on improving the strategic road network (the M25 and A3) are still years off. The Council have suggested a very expensive tunnel under Guildford, but this is no more than a dream. Even if Highways England accepted this (which is highly unlikely in the post-Brexit public spending climate) it would not be built until the end of the plan period at the earliest. Other, less expensive A3 improvements, and changes to the Junction 10/Heathrow stretch of the M25, will also take years to agree and complete.

The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is foolhardy. Surrey is the most congested county in England, with 683 people per square kilometre, compared with an English average of 413. This policy will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone). This is a major development constraint that should have been applied to the OAN before this consultation, and not left up in the air.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3323  Respondent: 15327905 / Julia Cook  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY I3 - Sustainable transport for new developments

I OBJECT. This is another vaguely aspirational policy, based on wishful thinking and not grounded in the practical realities of daily life. It consists of a standard, box-ticking list of local government measures unrelated to the specifics of the plan. Like infrastructure, transport appears to be an afterthought; the policy fails in its essential job of guiding planning decisions, since it assumes development of any kind can be supported by sustainable transport.

The sustainability of the dormitory settlements which the Council want built across the countryside depends on a general “modal shift” from private car use to walking, cycling and public transport. This is unrealistic. The proposed sites are often miles away from the nearest railway station. Bus services even in the largest villages are almost non-existent – just one bus to and from Guildford each day in the Horsleys and none at weekends. Since bus services depend on profitability, they cannot be expanded and the Council are not proposing to subsidise new ones. Rural buses are too slow anyway for busy people. Most rural roads in the borough are narrow, winding, hilly, potholed, muddy and unlit. Many flood badly and have no footpaths.

The desired modal shift would require a comprehensive co-ordination of bus and train timetables with services every few minutes, seven days a week, to stops within walking distance of every home in the borough. This kind of integrated public transport system has been achieved in Switzerland, for instance, but only at huge public cost and thanks to a political consensus supporting state ownership of trains, buses and the post office, which delivers rural passengers as well as mail. There is absolutely no chance of this in the UK.

The vast majority of the borough’s residents are not, in practice, able to cycle. This includes children, the elderly, commuters who have to look smart, the infirm, the unfit and people carrying goods or shopping of any kind. Dependence
on walking and cycling discriminates against these groups, which include some of the most vulnerable members of the community. It is socially unjust.

One in two working people in Guildford commute for up to 3 hours a day. They will not leave their cars for even part of their journey if it means longer travel times.

Park-and-rides are a welcome part of the transport mix but are too slow for commuters and others on a tight schedule. Well-off pensioners seem to be the main beneficiaries. For an adult couple going shopping it is still cheaper to park in town.

Forget about water buses. The Wey is too narrow and, with a river speed limit of 4mph, boats are too slow for anything but recreation. Except on the tideway, not even the Thames has such services.

The addition of two new stations appears attractive but will slow down train journeys, which are already slower than at any time since the 1930s. Knock-on effects on localities where the new stations are built have not been worked out or presented.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3308  Respondent: 15327905 / Julia Cook  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY P1 – Surrey Hills Area of Outstanding Natural Beauty

I OBJECT. This policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. The latter welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3309  Respondent: 15327905 / Julia Cook  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY P2 – Green Belt

I OBJECT. This policy states, “the general extent of the Green Belt has been retained.” This is a lie.

The policy wording is tepid in support of the Metropolitan Green Belt even though the latter forms 89% of the borough and should be the cornerstone of all local planning policy. It is precious beyond the short-term demands of the present Government’s policy or a 15-year local plan. As noted under Policy S1 above, it is a solemn legacy to future generations – an asset and amenity that belongs as much to Londoners and the whole nation as to the people who live in it. It is an inalienable public good. Once gone it is gone forever. It is not the Council’s to give away.

Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. Building on it involves high opportunity costs, including an irreversible loss of:

- Agricultural production
- Rural leisure and tourism amenities
- Water catchment
- Flood control
- Biodiversity
- Natural heritage
- A carbon sink for air pollution
- Room for public facilities such as parks and burial grounds
- Profitable film locations (e.g. Shere)
- Future economic potential such as mineral extraction (even fracking)
- Natural beauty, landmarks, open space, rural views and sight lines
- Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF)

As a matter of law, morality and national and local policy, these assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultations.

It is disreputable to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold. No-one argues that we should sell 1.6% of the Crown jewels in order to build houses.

I am not opposed to appropriate development in the Green Belt and recently supported a major planning application in my own village. But I fail to see why a system of fair burden-sharing of new development cannot be applied to the borough’s existing settlements in proportion to their size. This alternative would minimise the strain on infrastructure and maximise the chances of retaining the character of each settlement through gradual growth. It is reasonable to ask urban Guildford, with x times the population of semi-rural East Horsley for instance, to accommodate x times the number of new homes over the plan period. Parish councils could be asked, and will no doubt be willing, to propose where their quota of houses should go. Most rural residents are reasonable people who, if not alienated by top-down planners, will support realistic numbers of new houses in their neighbourhoods. Unfortunately, this democratic, bottom-up approach has not been attempted.

Instead, while developers flip and land-bank urban sites as a financial speculation, this plan will dump most new development on greenfield sites where building costs are lower, covering the Green Belt with dozens of housing estates that few residents want. 8,086 new houses are planned for the Green Belt but only 1,135 for Guildford urban area. This is disruptive, socially inequitable and unnecessary. It will not only destroy countryside but will also delay and disincentivise much-needed urban regeneration. The remarkable revival and repopulation of central London shows that building dormitory satellite settlements is an out-of-date approach to planning.

I particularly protest at the “insetting” of 14 villages from the Green Belt, and at “infilling” 12 of the borough’s Green Belt villages. I am deeply disturbed that settlement boundaries are to be hugely extended in many villages and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are “leggy” in outline, reflecting the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all
too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development.

I believe this policy is based on a flawed Green Belt and Countryside Study that, according to one Conservative Councillor, was irregularly commissioned by Council officers without the authority of Councillors. To “inset” two thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, although they would quickly destroy them if the proposed “insetting” and boundary extensions go ahead. This policy is wildly disproportionate in terms of any foreseeable development need (especially post-Brexit) and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3310  Respondent: 15327905 / Julia Cook  Agent:

Policy P4 – Flood risk and water source protection zones

I OBJECT. Urban development on existing hardstanding would not create additional flood risk, especially where there is scope for improved flood resistance measures to be included in the design. Sites such as the Arriva bus depot, on the River Wey bank, are potential high-value brownfield sites that would not be available for housing if this policy is implemented. It is not the footprint of existing buildings that should limit future development, but the extent of existing hardstanding. Tarmac and concrete do not act as functional floodplain, and some land with hard standing close to the river, within the town centre and within easy walking distance of the railway station, provides an excellent opportunity for real urban regeneration that could protect the surrounding countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3312  Respondent: 15327905 / Julia Cook  Agent:

Policy P5 – Flood risk and water source protection zones

I OBJECT. Urban development on existing hardstanding would not create additional flood risk, especially where there is scope for improved flood resistance measures to be included in the design. Sites such as the Arriva bus depot, on the River Wey bank, are potential high-value brownfield sites that would not be available for housing if this policy is implemented. It is not the footprint of existing buildings that should limit future development, but the extent of existing hardstanding. Tarmac and concrete do not act as functional floodplain, and some land with hard standing close to the river, within the town centre and within easy walking distance of the railway station, provides an excellent opportunity for real urban regeneration that could protect the surrounding countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY P5 - Thames Basin Heath Special Protection Areas

I OBJECT. This policy is weak. The mitigation (cash compensation) offered for development in the special protection area is so small as to be meaningless.

SANG (Suitable Alternative Natural Greenspace) is not beneficial since the sites identified or targeted are already green space. This is just using agricultural or wooded land as recreation land in order to justify building on other green spaces nearby. There is no actual increase in open space or environmental protection; instead, it is a ploy designed to permit building on otherwise protected areas. SANG – in part used to prevent dogs and cats attacking nesting birds – must also ensure that it is not using land which is adjacent to the Special Protection Areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3301  Respondent: 15327905 / Julia Cook  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY S1 – Presumption in favour of sustainable development

I OBJECT. The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” Standing at the head of the draft plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The promise “to secure development that secures the economic, social and environmental conditions in the area” omits to recognise that economic growth, social justice and environmental protection often conflict. It does not say how each element is to be weighted or conflicts resolved. As a practical guide to the tough choices Councillors will face, it is useless. Under this policy, any development will qualify as “sustainable”, thereby failing to apply the NPPF’s most important guideline.

The most gaping hole in Policy S1 is the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. It is the envy of the world. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The plan’s contempt for Green Belt constraints is amply demonstrated in later policies.

The commitment to approve planning applications “wherever possible” and “without delay” reveals this draft plan’s pro-development bias. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17. In my view Policy S1 is a non-policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY S2 –Borough Wide Strategy

I OBJECT. I have 5 objections to the proposal to build 13,860 new homes:

1. The number is based on pre-Brexit projections for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

2. The number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half the people who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent districts of Rushmoor and Mole Valley, minutes from Guildford town, are outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere. Unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and is part of a far wider and more complex housing market.

3. These concerns have been raised since 2014 but the Council have failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so the housing numbers derived from it are unreliable. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county (none in Mole Valley, for instance). This highly lopsided distribution is unexplained.

4. The figure of 13,860 new homes is unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by commercial sub-contractor used in preparing the SHMA. The Council say we should trust the contractors’ model because it is used by a large number of other local authorities. Wide usage, however, does not confer objectivity. Guildford’s OAN would fail the basic transparency test even if the methodology used were a universally admired ‘gold standard’. But it is not: it belongs to consultants whose website openly proclaim their pro-development agenda, provoking reasonable suspicion that the figures are inflated. External experts and members of the public have provided detailed critiques of the model. Its most fatal flaw, however, is that it has not been disclosed – not even to the authors of the plan, who have taken it on trust. This is irrational and unsound.

5. The status of the 13,860 figure is ambiguous. The plan fails to set a Housing Target of new homes to be built, or explain how this relates to the “Objectively Assessed Number” (OAN) for housing need. Elsewhere, the Council have said that the two are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted, but in the same breath say that infrastructure or other constraints may in due course affect deliverability. Despite the NPPF, the plan fails to address these constraints. In any case, the number of homes proposed, plus existing planning permission, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a Housing Target that takes normal constraints and adjustments credibly into account, and which leaves the Council to set one at any level without further consultation. Even if the OAN were not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.
It is irrational to embark on a radical transformation of the borough without a clear Housing Target. Most of Guildford borough is theoretically protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the existing number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1001  Respondent: 15328097 / Tim, Barbara, Hugh and Clare Strange  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Guildford Borough Council’s Proposed Submission Local Plan: strategy and sites

My wife and I and our two children have lived in East Horsley since 2001 and we object to the proposals in the new Guildford local plan for the following reasons:

-We do not want the Horsleys to be removed from the Green Belt. The Green Belt protects our living environment and there is no justification to remove it;

-We do not want the Horsley settlement boundaries to be extended. We want to retain the existing village atmosphere and lifestyle;

-We do not want the development of over 2000 houses on the former Wisley airfield. The impact on our village would be enormous and make life intolerable; and,

-The local infrastructure is overloaded. It is difficult to get a medical appointment and to find a parking space in the village centre. The local schools are over-subscribed and the roads congested. The Local Plan would considerably worsen matters.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1004  Respondent: 15328161 / Louise Midgley  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
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I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 15328161 / Louise Midgley</th>
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I object to new sites (Garlicks Arch) being introduced as an after thought when it was not even considered in the previous plan. A slip road on the A3 at Burnt Common has been added to the Draft Local Plan without Highways England consent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to a totally unrealistic number of houses for the country lanes to absorb.

I object to the 2016 Draft Local Plan as it has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/3326  Respondent: 15328161 / Louise Midgley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3325  Respondent: 15328161 / Louise Midgley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners’ views, or the costs involved in improving the infrastructure, currently out side their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
My objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield now known as Three Farm Meadows - Allocation A35 - the phased development of a new settlement of up to 2100 dwellings.

I very strongly object to the draft local plan for many reasons - and I wonder if any of the Councillors have really considered this proposal, and many others in the neighbourhood - over 600 houses in Horsleys, 400 in Burnt Common, 2000 houses on Gosden Hill Farm (Burpham) plus a number of smaller sites in nearby villages. These add up to in excess of 5000 new dwellings in this neighbourhood.

As far as I am aware no Councillor or Planning Officer has ever been to or considered the enormous effect that this would have, not only on the residents in these areas but many other people from far and wide. I wonder if the Councillors or Planning Officers even know where these places are and, possibly as they do not live near the area affected, they feel that they are correct in putting these plans forward (NIM BY/SM).

If these building projects were carried out then there would be total traffic gridlock not only in the local area but on the M25 and A3 and, of course on every one of the smaller roads in Surrey and the surrounding Counties.

Amongst my other objections to the draft local plan, where no consideration has been given, are:

- There are not sufficient Transport links (railways, buses or roads)
- There are not sufficient Schools/Academies to educate possibly up to 10,000 children in the area. There are insufficient shopping and parking facilities
- The roads in the area cannot take any increase in traffic as this contribute to grave danger to all users (car drivers, pedestrians and cyclists, etc)
- The air pollution is already at a high level and any increase caused would be well in excess of the legal level.
- I was under the impression that the Councillors had previously stated in their Manifesto that "the Green belt is safe" it now appears that these words were totally meaningless and untrustworthy.
- Councillors and planning officials have no right nor lawful reason to turn prime Greenfield land into an enormous urban sprawl/slum stretching from Greater London to Guildford and probably further out.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPA16/1006    Respondent: 15328257 / Annabel Purcell    Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send Marsh/Burnt Common

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I write to object to Send Village being removed from the Green Belt. The Green Belt was intended to be permanent, as required by the National Planning Framework, and there are no special circumstances to justify abandoning it. Send's Green Belt provides an essential buffer stopping Woking and Guildford becoming one conurbation. Local council lots and central government gave a clear election promise to protect the Green Belt and this reneges on it. Developers will be quick to take advantage and here will be nothing to stop them.

I object to building 45 houses at Clockbarn Nursery because of inadequate access and traffic volume. Tannery Lane is far too narrow and twisty to take any more traffic. The junction with Send Road is already very hazardous for vehicles trying to join the main road. The lane cannot take any more, the already very dangerous junction will be become much worse.

I object to building 400 houses and 7000sq metres of industrial space at Garlick's Arch, opposite Send Marsh Road. The site floods and is covered in ancient woodland. The industrial space is not needed but if it were should be at Slyfield. Guildford's housing requirements have been shown to be grossly exaggerated and they have refused to disclose their calculations. With proper use of brownfield sites this Green Belt site is not needed.

I object to the development of 40 houses and 2 traveller's pitches at Send Hill. It is an inappropriate location because the narrow width single access country road provides insufficient access. The subsoil of the proposed site contains documents unsafe landfill waste registered at GBC. Any development there would spoil a high amenity area set in beautiful countryside.

I object to a new interchange with the A3 at Burnt Common because Send would have to take traffic from the proposed 2000 new houses at Wisley Airfield, 2000 houses at Gosden Hill, Burpham and 1850 at Blackwell Farm. Much of this traffic to and from the A3, M25, Woking and Guildford would go through Send. Send Road, which is already overloaded would become gridlocked. Noise and pollution levels, which are already excessive at the back of our property would worsen. This must be avoided.

I also hereby request that my comments are shown to the Planning Inspector that will make the ultimate decision noting my objection.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1007    Respondent: 15328353 / Lynne Ford    Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Chilworth

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

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I wish to object very strongly to the Council's proposals to remove Chilworth and adjoining villages from the Green Belt. There will be no protection against development and will turn this area into a strip development area which will ruin this area of its natural beauty.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1008  Respondent: 15328417 / Malcolm Ford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Chilworth

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to object strongly to Guildford Local Plan to remove Chilworth and surrounding villages from the Green Belt. The purpose of the Green Belt is to protect land around urban areas from new house building sprawl and give access to green spaces for town and city dwellers.

Your proposals do not conform to the above.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1009  Respondent: 15328449 / Fiona and Keith Watson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We have recently moved to Horsley from neighbouring Effingham and we are frankly shocked to see the proposals for housing throughout the whole of our area.

Whilst we understand that there is a need for housing this plan seems excessive and will effectively destroy these old villages just creating an urban sprawl.

There also seems no forethought regarding infrastructure. At the moment there is only 1 doctors surgery which supports both the Horsleys and Effingham, (always very busy and difficult now to get an appointment) and only 1 secondary school which again supports over 2000 pupils and despite its good reputation is way too large to give proper pastoral care to
individual pupils. All these extra homes puts increased pressure on services already full to capacity. The council can't seem to cope with what we already live with. The roads are in a poor state and verges and common land are not properly or regularly maintained.

We are totally against removing green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1011  Respondent: 15328481 / Millie Midgley  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1526  Respondent: 15328481 / Millie Midgley  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to new sites (Garlicks Arch) being introduced as an after thought when it was not even considered in the previous plan. A slip road on the A3 at Burnt Common has been added to the Draft Local Plan without Highways England consent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3334  Respondent: 15328481 / Millie Midgley  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to a totally unrealistic number of houses for the country lanes to absorb.
I object to the 2016 Draft Local Plan as it has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/3338  Respondent: 15328481 / Millie Midgley  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of villages from the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/3337  Respondent: 15328481 / Millie Midgley  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.
I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners’ views, or the costs involved in improving the infrastructure, currently out side their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPA16/1010  **Respondent:** 15328513 / Pauline Baldwin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send Marsh/ Burnt Common

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Send village losing its green belt status. The green belt stops Woking and Guildford becoming one conurbation. There are no special circumstances to justify this proposal.

I object to the proposed development at Clockbarn Nursery. Tannery Lane is far too narrow to cope with additional traffic, and the junction with Send Road is already difficult for vehicles to emerge safely.

I object to building of houses and industrial space at Garlick’s Arch. The site includes ancient woodland and is subject to flooding.

I object to the development at Send Hill. The road access is insufficient. The site contains unsafe landfill waste.

I object to any proposal that increases traffic along Send Road. This road is already under severe pressure during ‘rush hour’.

Please pass my comments to the Planning Inspector.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/3339  **Respondent:** 15328545 / Steva Claue  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I am writing to object to the removal of green belt protection for Chilworth and other villages. Chilworth has already had more than its fair share of new houses built in recent years, many on business promises bought by developers. The roads here are already overloaded especially at peak times the only people to benefit by more houses are the landowners and developers local people will suffer longer delays on the roads, longer doctors waiting times etc the list goes on. This green belt removal to enable the proposed development to get the green light at Ham hatch Woodyard farm.

Why is it the same villages that have to be built over, its time the more efficient villages live Blockheath who have not had any new houses built for years bare some of the brunt we in Chilworth, Shalford, Peasmarsh etc have to put up with it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1527  Respondent: 15328705 / Robin Jones  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

I object to the Normandy/Flexford housing development plan put forward by Taylor/Wimpy. They are a national housing development company with one business objective -to build houses. They have no interest in Normandy as a village. They have no interest in our rural character, they only want to build houses in any location which is commercially viable -and that is how they see Normandy.

I am saddened that GBC have been lured into serious consideration of the plan. Surely, the important debate in council must relate to the size and type of selective developments which would naturally fit into the existing village landscape and so contribute to the overall housing numbers required in West Surrey.

Please, please GBC -think again. Consider what is best for the village of Normandy and not the thought that a single large plan in one area by one developer will save a lot of council time and investment. Please consider what is right -not what is easy.

May I add one final thought for consideration. A 4000 house development is already under way in the Aldershot area. There will obviously be developments in Guildford and Waverley. If we add up all the new housing numbers which have been quoted do they not already far exceed the number requested by government. I have a belief that they do which points to one simple fact - 1100 new houses are not needed in Normandy so let us leave the village and its surrounding landscape as a natural "green belt" buffer zone between the invading urban sprawl to east and west.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: pslp173/395</th>
<th>Respondent: 15328705 / Robin Jones</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Normandy and Flexford</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

The revised local plan shows a practical evaluation of the needs for building development in the Guildford area and the best possible areas for such development. The exclusion of sites A46 and A47 in the village of Normandy has my full support. The infrastructure of Normandy, with its C and D roads is at capacity. Major investment in bridge changes; road widening and new pavements; new roundabouts and traffic lights; improved waste and surface water disposal; a new sewage disposal system; better street lighting and a larger doctor's surgery must all be dealt with, in part or in total before any new developments could be considered. When these important investments have been made I would support, as would many villagers, small developments in selected areas, but we could never support the mass development of a large housing complex on green belt land which would destroy forever a beautiful part of rural England.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
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<th>Comment ID: PSLPA16/1014</th>
<th>Respondent: 15328769 / Anne Cox</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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**Answer (if comment is on questions 1-7 of the questionnaire):** ()

In West Horsley, the facilities that are available i.e limited public transport, schooling and as I understand, no shops available (from September 2016) would not be able to sustain the number of houses that are proposed. Furthermore, it seems that there are no plans available as yet for the infrastructure- drainage is inadequate now on the roads in the village.

In East Horsley, again there is inadequate parking now for the use of the shops and station, and the extra houses in both villages, will make it impossible to make appointments at an already very busy Medical Centre.

Finally, how will our sewage and waste water system cope?

None of the points seem to have been considered or explained.

I therefore strongly object to this present plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
We have the following objections to Current Local Plan as detailed below and wish our views are taken note of. It is relevant that these views are shared by the majority of Send residents and we have not attempted to modify the comments already made by others, as we concur with these views entirely:

1. **WE OBJECT to Send Village being removed from the Green Belt.** The Green Belt was intended to be permanent, as required by the National Planning Policy Framework and there are no special circumstances to justify abandoning it. Sends Green Belt provides an essential buffer stopping Woking and Guildford becoming one conurbation. Local councillors and central government gave a clear election promise to protect the Green Belt and this reneges on it. Developers will be quick to take advantage and there will be nothing to stop them.

2. **WE OBJECT to building 45 houses at Clockbarn Nursery** because of inadequate access and traffic volume. Tannery Lane is far too narrow and twisty to take any more traffic. The junction with Send Road is already very hazardous for vehicles trying to join the main road. Planning permission has previously been given for 64 apartments at the Tannery and for building the Marina, both of which will generate additional heavy traffic. The lane cannot take any more. The junction is too dangerous already and will be made much worse.

3. **WE OBJECT to building 400 houses and 7000 sq metres of industrial space at Garlick's Arch, opposite Send Marsh Road.** The site floods and is covered by ancient woodland. The industrial space is not needed but if it were it should be at Slyfield. Guildford's housing requirements have been shown to be grossly exaggerated and they have refused to disclose their calculations. With proper use of Brownfield sites this Green Belt site is not needed.

4. **WE OBJECT to the development of 40 houses and 2 traveller’s pitches at Send Hill.** It is an inappropriate location because the narrow Width single access country road provides insufficient access. The subsoil of the proposed site contains documented unsafe landfill waste registered at GBC. Any development there would spoil a high amenity area set in beautiful countryside and furthermore, any visit to Send Hill by GBC during the times that children are collected from school by their parents will reveal that traffic chaos is already well developed.

5. **We OBJECT to a new interchange with the A3 at Burnt Common** because Send would have to take traffic from the proposed 2000 new houses at Wisley Airfield, 2000 houses at Gosden Hill, Burpham and 1850 at Blackwell Farm?. Much of this traffic to and fro the A3, M25, Woking and Guildford would go through Send. Send Road, which is already overloaded, would become gridlocked. Noise and pollution levels, already at excessive levels, would worsen. This must be avoided.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I object to any building on Green Belt Land as this was, initially, created to prevent this type of gross urbanization.

I object to the proposed building on Gosden Hill Farm where the Green Belt was designated to protect West Clandon.

I object to Brown Field Land being used for unnecessary retail expansion when there are empty shops in the High Street.

For future generations, it is essential to keep these open green spaces with less, rather than more pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

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Attached documents:

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I object to a totally unrealistic number of houses for the country lanes to absorb.

I object to the 2016 Draft Local Plan as it has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/3352</th>
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I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3353  Respondent: 15328993 / B. Joseph  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (

I object to a totally unrealistic number of houses for the country lanes to absorb.

I object to the 2016 Draft Local Plan as it has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3355  Respondent: 15328993 / B. Joseph  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3354  Respondent: 15328993 / B. Joseph  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners’ views, or the costs involved in improving the infrastructure, currently out side their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the proposed building on Green Belt Land as this was created to prevent the spread of housing that linked up the small rural communities turning them into an urban sprawl.

I object to the proposed building on Gosden Hill Farm where the Green Belt was designated to protect West Clandon as above.

I object to Brown Field Land being used for unnecessary retail expansion when there are empty shops in the High Street.

I object to the scale of the proposed building in the borough as the infrastructure will not support this level of development.

I object to any reduction in Green Belt land which is vital for children to have an understanding of nature and how this affects mankind.

For future generations, it is essential to keep these open green spaces with less, rather than more pollution.
I object to Policy 43. Land at Garlicks Arch.

There is no proven need for additional 400 new houses on top of the 13,860 already proposed by the borough.

The Surgery at send cannot cope, the local schools cannot cope. The entire plan is ill conceived.

Summary.

Your plans have blighted my family home for years, the plan originally put a development at the back of my house, and now your new plans have changed it to the development at the front of my family home. Therefore having a huge detrimental effect on the value, and destroying our views of the farmland at the front. Therefore your poorly thought through local plan have provided uncertainty and anxiety to myself and my family.

As no speed restrictions, speed camera or traffic calming measures on the blind corner heading towards send over the A3 is a accident waiting to happen. As it is we can only turn left when leaving our home and even then it is very dangerous.

You have not addressed the infrastructure requirements such as schools, health centres and hospital capacity, in these proposals, for new homes.

Therefore this plan needs to be thought through and new alternative proposals need to be looked at.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the creation of the new north and southbound slip roads to and from the A3.

I live on Clandon Road, and worked in and around Ripley since the late 80’s. The major bottle neck is Send Village, which this plan will on exacerbate.

The danger is the off slip going North at Burnt Common that again this will exacerbate with more people using it.

I went to the Public Consultation on Tuesday 21 June 2016, at East Horsley Village Hall between 12noon and 8pm. I met a gentleman called Martin from Highways

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I am not often motivated to write, but I have seldom viewed such poorly thought through local plan.

I object to the erosion of the Green Belt.

Why bother to spend all the money and time constructing the Green Belt in the first place, if you can just remove what you wish to at will.

It is very sad and ill conceived that the Borough wishes to remove any Surrey Villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the Limited Consultation Period.

I find it disingenuous to the last minute inclusion of new sites i.e. Garlick’s Arch with less than two weeks notice, just because it would appear that the developer has offered a new on and off slip to the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2292  Respondent: 15329345 / Robin Hurst  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A43, Land at Garlicks Arch.

• There is no proven need for additional 400 new houses on top of the 13,860 already proposed by the borough.
• The Health Surgery at send cannot cope, the local schools cannot cope.. The entire plan is ill conceived.
• It continues to ignore tens of thousands of previous objections.
• There is no proven demand for Travelling Show people plots in this location.
• There are no “exceptional circumstances” exist for removing this site from the greenbelt.
• The land is subject to frequent flooding and is currently flood Zone 2 allocation.
• It will join the villages of Send and Ripley and defeat one of the intended purposes of the greenbelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1678  Respondent: 15329345 / Robin Hurst  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Land at Burnt Common London Road, policy A58

• The exit heading North from the A3 is one of the most dangerous exists, and you want to intentionally put more heavy goods traffic through it.
• The impact on the surrounding roads will be immense and cause traffic gridlock.
• It was deleted from the 2014 draft because of the amount of objections made.
• The word “minimum” is changed to the previous maximum in the 2016 plan.
• There is no need to build more industrial or warehouse development in the middle of the greenbelt when Slyfield and Guildford still have empty sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2293  Respondent: 15329345 / Robin Hurst  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1019  Respondent: 15329409 / Emma Wicks  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1536  Respondent: 15329409 / Emma Wicks  Agent:
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Attached documents:

Comment ID: PSLPP16/3360  Respondent: 15329409 / Emma Wicks  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

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The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1018  Respondent: 15329441 / Suzie Powell-Cullingford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to SHMA figure of 693 homes per annum. The methodology determining the GBC SHMA figure seems to be cloaked in secrecy in spite of many requests from residents in the borough to examine the evidence base. We certainly know that the figure of 693 pa is artificially inflated due to the inclusion of many numbers of Surrey University and Law College students, many of whom are foreign students with absolutely no intention of remaining in the UK let alone within our borough. The inaccuracy of the SHMA assessment is a major concern as there is no transparency allowing for any investigation of modelling used. This is not democratic and indeed is
one of the most heatedly discussed aspects of this Local Plan. More importantly, GBC have an absolute ability to massively reduce any SHMA figure by implementing the NPPF guidelines regarding protection of our Greenbelt, AONB and Thames Basin Heath SPA. GBC have conspicuously refused to address this issue, whereas many other Borough Councils have utilised these planning constraints to significantly reduce their own SHMA. Why is GBC failing to protect our Greenbelt, wildlife and beautiful landscape? In addition to this, surely we must reconsider all housing needs assessment given the recent BREXIT referendum, the current instability of the UK politically and the absolute certainty that mass net migration from Europe into the South East of England will no longer be such a huge issue, with the resulting decrease in demand for additional housing in the South East.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1800  Respondent: 15329441 / Suzie Powell-Cullingford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to SHMA figure of 693 homes per annum. The methodology determining the GBC SHMA figure seems to be cloaked in secrecy in spite of many requests from residents in the borough to examine the evidence base. We certainly know that the figure of 693 pa is artificially inflated due to the inclusion of many numbers of Surrey University and Law College students. many of whom are foreign students with absolutely no intention of remaining in the UK let alone within our borough. The inaccuracy of the SliMA assessment is a major concern as there is no transparency allowing for any investigation of modelling used. This is not democratic and indeed is one of the most heatedly discussed aspects of this Local Plan. More importantly, GBC have an absolute ability to massively reduce any SHMA figure by implementing the NPPF guidelines regarding protection of our Greenbelt. AONB and Thames Basin Heath SPA. GBC have conspicuously refused to address this issue, whereas many other Borough Councils have utilised these planning constraints to significantly reduce their own SHMA. Why is GBC failing to protect our Greenbelt, wildlife and beautiful landscape? In addition to this, surely we must reconsider all housing needs assessment given the recent BREXIT referendum, the current instability of the UK politically and the absolute certainty that mass net migration from Europe into the South East of England will no longer be such a huge issue, with the resulting decrease in demand for additional housing in the South East.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1534  Respondent: 15329441 / Suzie Powell-Cullingford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
RE: OBJECTION to Guildford Borough Council 2016 Revised Draft Local Plan

I am writing to object to the revised draft 2016 Local Plan for the reasons listed below:

1. I OBJECT to Policy A43 Garlick's Arch as this was a late substitution for an alternative site known as Land at Burnt Common (also included in the 2014 Draft Local Plan). There was no consultation on this substitution, following an emergency meeting of the Executive on 11th May 2016. This does not comply with Regulation 18 of the Planning and Compulsory Purchase Act 2004 relating to the Statement of Community Involvement, as there has not been any community information or consultation regarding Garlick's Arch site. In addition, this site substitution also remained as the same policy number ie A43, which has led to further confusion within the local community. The original Policy A43 site of brownfield land at Burnt Common is already designated as industrial and indeed the owners of this site have already spent at least two years developing planning proposals with GBC to include 100 homes in addition to a fully developed industrial site, with ample space to accommodate at least an additional 7000 sq m. The Garlick's Arch site however is not suitable for development given that it is designated as Green Belt (policy P2). The Local Plan clearly states a preference for best utilising previously developed land. Why then has a brownfield site been removed and replaced with a Greenbelt site?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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| 1. I OBJECT to Policy A43a provision of northbound and southbound on/off ramps to/from A3 at Burnt Common. Again there has been no Regulation 18 consultation on this policy site. The whole area surrounding the new A3 access will be a traffic congestion hotspot, with no possibility of relief or mitigation due to the narrow roads leading to Burnt Common from Clandon, Horsleys, Send, Ripley and Woking. These narrow roads cannot be improved, many are small country lanes, and most are already massively congested at peak times. In addition, the A3 itself is always hugely congested in both directions, from M25 J10 to beyond the A3/A31 junction south of Guildford. Highways England already refer to this stretch of the A3 as being at peak capacity, without the addition of thousands of extra cars, as a result of any or all of the strategic sites in the Local Plan being developed. The addition of an additional two way ramp at Burnt Common will not improve this situation and will most likely cause even further backlog on the small local road network. |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |

| Comment ID: PSLPS16/3522   Respondent: 15329441 / Suzie Powell-Cullingford   Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a |

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| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |

| Comment ID: PSLPP16/3365   Respondent: 15329441 / Suzie Powell-Cullingford   Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1 |
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the sustainable employment policy (Policy E1) in relation to site A43 Garlick's Arch, as there is an existing industrial site nearby at Burnt Common, originally identified in 2014, that is able to provide more sustainable further industrial development and housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7826  Respondent: 15329441 / Suzie Powell-Cullingford  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the sustainable employment policy (Policy E1) in relation to site A43 Garlick's Arch, as there is an existing industrial site nearby at Burnt Common, originally identified in 2014, that is able to provide more sustainable further industrial development and housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3366  Respondent: 15329441 / Suzie Powell-Cullingford  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the loss of the rural employment site at Oldlands Field Yard (Policy E5) which is incorporated into the site A43 Garlick's Arch. There are some 25 employees based in 3 separate long standing businesses that will lose their jobs as a direct result of the closure of this small industrial site. None of the businesses wish to vacate their premises. Indeed Surrey Classic Cars has been on site for over 30 years and is a renowned MG restoration specialist, with nowhere else to relocate locally or affordably.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. I OBJECT to the loss of the rural employment site at Oldlands Field Yard (Policy E5) which is incorporated into the site A43 Garlick's Arch. There are some 25 employees based in 3 separate long standing businesses that will lose their jobs as a direct result of the closure of this small industrial site. None of the businesses wish to vacate their premises. Indeed Surrey Classic Cars has been on site for over 30 years and is a renowned MG restoration specialist, with nowhere else to relocate locally or affordably.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1. I OBJECT to the lack of infrastructure planning for sites (Policy I1) specifically for site A43 Garlick's Arch, which is allocated as a strategic site. There is no provision for improvements to the basic utilities such as power and sewerage and indeed the Garlick's Arch site has 3 electricity pylons directly running through the entire site. The local health service provided by The Villages Medical Centre in Send is already at capacity and serves the combined local communities of Ripley and Send. There is no provision to address this key issue.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the lack of infrastructure planning for sites (Policy I1) specifically for site A43 Garlick’s Arch, which is allocated as a strategic site. There is no provision for improvements to the basic utilities such as power and sewerage and indeed the Garlick’s Arch site has 3 electricity pylons directly running through the entire site. The local health service provided by The Villages medical Centre in Send is already at capacity and serves the combined local communities of Ripley and Send. There is no provision to address this key issue.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7806  Respondent: 15329441 / Suzie Powell-Cullingford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3. I OBJECT to the traffic congestion caused by the ribbon of development along the A3, specifically from Policy A35 Wisley Airfield, Policy A43 Garlick's Arch, Policy A25 Gosden Hill and Policy A26 Blackwell Farm (policy I2). Highways England do not have any provision to even examine the A3 until at least 2020, therefore it is entirely possible that GBC will undertake massive housing construction before any road infrastructure has even been discussed, let alone planned and built. This is completely unacceptable for the many thousands of existing residents who will be impacted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3359  Respondent: 15329441 / Suzie Powell-Cullingford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I OBJECT to the traffic congestion caused by the ribbon of development along the A3, specifically from Policy A35 Wisley Airfield, Policy A43 Garlick's Arch, Policy A25 Gosden Hill and Policy A26 Blackwell Farm (Policy I2). Highways England do not have any provision to even examine the A3 until at least 2020, therefore it is entirely possible that GBC will undertake massive housing construction before any road infrastructure has even been discussed, let alone planned and built. This is completely unacceptable for the many thousands of existing residents who will be impacted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3362  Respondent: 15329441 / Suzie Powell-Cullingford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to all insetting of villages from the Greenbelt. It is my fundamental belief that the Metropolitan Greenbelt serves a highly significant role in the preservation of open space and should be rigorously protected for future generations. In particular I refer to my objection of the insetting of the beautiful rural villages of Ripley, West Horsley, East Horsley, Send Marsh/Burnt Common, Chilworth, Shalford, Albury, Shere and Peaslake. It is indefensible that these areas of great beauty in the Surrey Hills should lose their Greenbelt status and there is no clear demonstration of exceptional circumstance to allow this to happen. As a resident of Guildford borough for over 45 years, I can attest to the huge numbers of visitors who regularly walk, ramble and cycle in the countryside of our borough. Many of these visitors are from London and the suburbs and who need fresh air and unrestricted countryside views as an antidote to urban living. Ripley is on the Olympic cycle route and the hugely popular Ride London route. There are thousands of cyclists utilising our country lanes every weekend, enjoying the wonderful countryside. Surely Londoners deserve an escape route too, just an hour away from the confines of the metropolis?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7772  Respondent: 15329441 / Suzie Powell-Cullingford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The Garlick’s Arch site however is not suitable for development given that it is designated as GreenBelt (Policy P2). The Local Plan clearly states a preference for best utilising previously developed land. Why then has a brownfield site been removed and replaced with a Greenbelt site?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/7817  **Respondent:** 15329441 / Suzie Powell-Cullingford  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

1. I object to all insetting of villages from the Greenbelt. It is my fundamental belief that the Metropolitan Greenbelt serves a highly significant role in the preservation of open space and should be rigorously protected for future generations. In particular I refer to my objection of the insetting of the beautiful rural villages of Ripley, West Horsley, East Horsley, Send, Marsh/BurntCommon, Chilworth. Shalford, Albury, Shere and Peaslake. It is indefensible that these areas of great beauty in the Surrey Hills should lose their Greenbelt status and there is no clear demonstration of exceptional circumstance to allow this to happen. As a resident of Guildford borough for over 45 years. I can attest to the huge numbers of visitors who regularly walk, ramble and cycle in the countryside of our borough. Many of these visitors are from London and the suburbs and who need fresh air and unrestricted countryside views as an antidote to urban living. Ripley is on the Olympic cycle route and the hugely popular Ride London route. There are thousands of cyclists utilising our country lanes every weekend, enjoying the wonderful countryside. Surely Londoners deserve an escape route too, just an hour away from the confines of the metropolis?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/3364  **Respondent:** 15329441 / Suzie Powell-Cullingford  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**
1. I OBJECT to Policy P4 development in areas at risk from flooding. As a resident of Kiln Lane, on the edge of site A43 Garlick's Arch, I can categorically confirm that this site floods EVERY YEAR and not just during the winter months. The stream that runs through the middle of this site into the River Wey is categorised as Flood Zone 3 according to the Environment Agency flood map website. The soil is very heavy clay (Kiln Lane historically housed a brick kilns manufacturing business from locally sourced clay) which further adds to the flooding problems and the land remains water-logged for many weeks following any significant rainfall. GBC have assessed the site as predominantly zone 1, which is clearly inaccurate and therefore the SFRA cannot be deemed useable or fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7821  Respondent: 15329441 / Suzie Powell-Cullingford  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy P4 development in areas at risk from flooding. As a resident of Kiln Lane, on the edge of site A43 Garlick's Arch, I can categorically confirm that this site floods EVERY YEAR and not just during the winter months. The stream that runs through the middle of this site into the River Wey is categorised as Flood Zone 3 according to the Environment Agency flood map website. The soil is very heavy clay (Kiln Lane historically housed a brick kilns manufacturing business from locally sourced clay) which further adds to the flooding problems and the land remains water-logged for many weeks following any significant rainfall. GBC have assessed the site as predominantly zone 1, which is clearly inaccurate and therefore the SFRA cannot be deemed useable or fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3367  Respondent: 15329441 / Suzie Powell-Cullingford  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I OBJECT to the disproportionate amount of development in one area of the borough (Policy S2). The strategic sites of A43 Garlick's Arch, site A25 Gosden Hill and site A35 Wisley Airfield are all within a 5 mile distance and represent over 35% of all housing allocated in the borough, essentially creating coalescence of all local villages. The individual identities of each village will be lost. We are NOT urban villages but are rural villages with thriving engaged local communities, each with their own individual character and historical identity. I also believe that Ripley has already grown significantly over the past 5 years, with an approximate 8% increase in housing. However, all these have been small developments of generally less than 10 units and as such, have been able to successfully merge and be absorbed into the existing community. This will not be the case with the huge numbers of homes proposed on the 3 strategic sites mentioned.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7831  Respondent: 15329441 / Suzie Powell-Cullingford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7839  Respondent: 15329441 / Suzie Powell-Cullingford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I OBJECT to the way in which this consultation process has been processed by GBC. Many residents remain unaware that such significant proposals are afoot, which will have a 15 year affect on people's lives. If you are not a regular reader of the Surrey Advertiser, you would probably not know anything about the Local Plan. Indeed, the majority of information provided to residents of the borough has been provided by either parish councils or concerned local residents groups such as Wisley Action Group. Save Send Action Group. Ripley Action Group. CPRE and other bodies. This is not acceptable in a democratic society, particularly in view of the fact that the Conservative borough councillors had an election promise to protect the Greenbelt which they fundamentally appear to be totally disregarding. In essence, residents are trusting GBC to uphold their election promises, without being given the information regarding the revised Local Plan. I do not accept that local plan documents held in a small handful of local libraries constitutes appropriate consultation. I have attended many local meetings in Clandon, Send, Merrow and Ripley (all of which have been organised by local bodies, NOT GBC) held to discuss the proposals in the 2016 Local Plan. I can honestly say that there is whole hearted disapproval from every aspect of each community.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7840  Respondent: 15329441 / Suzie Powell-Cullingford  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In conclusion, this revised 2016 Local Plan is not fit for purpose, is unsound does not represent in any way how most exciting residents wish to see their homes, communities and borough develop over the next 15 years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/681  Respondent: 15329441 / Suzie Powell-Cullingford  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Page 1641 of 2804
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In conclusion, this revised 2016 Local Plan is not fit for purpose, is unsound does not represent in any way how most existing residents wish to see their homes, communities and borough develop over the next 15 years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1021  Respondent: 15329505 / Martine Early  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of immediate provision for new schools.

I object to the lack of the immediate provision of Doctors surgeries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1020  Respondent: 15329505 / Martine Early  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the lack of any evidence for the alleged housing numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3368  Respondent: 15329505 / Martine Early  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object strongly to the 2016 New Local Draft Plan.
I object to the erosion of the Green Belt.
I object to the insetting of any villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3369  Respondent: 15329505 / Martine Early  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the disproportionate amount of development in one area of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Respondent: 15329537 / J Sweby</th>
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<td>I object to the vast number of houses proposed on Gosden Farm.</td>
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<td>I object to the proposed development at Garlick's Arch. The destruction of ancient woodland will still result in unacceptable levels in the increase of noise and pollution to the residents of Send marsh and Burnt common. It is also an important habitat for declining numbers of hedgehogs and thrushes and the wild life.</td>
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<td>I object to the number of houses and industrial units at Garlicks Arch. I question the need for those houses in the area.</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to the quiet hamlet of Burnt common being turned into a traffic junction.</td>
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<th>Respondent: 15329537 / J Sweby</th>
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<td>I object to the number of vehicles on our already congested roads. Between 7.45-8.30 am and 5-6 pm the routes from burnt common to Guildford are gridlocked from the Burpham slip road to Guildford and from the roundabout at Clandon Park Gates through Merrow. Another 5,000 vehicles on this 5 mile stretch will make the journey unbearable.</td>
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I object to school children having to spend 30-45 mins in a traffic jam before arriving at school.

I object to more houses in Send because of the lack of infrastructure. There are already local children who cannot get places in the village schools.

I object to the stress this extra housing would put on our excellent village medical centre. It is already a lottery as to whether an appointment can be made when needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to Send, Ripley, Burnt Common and Gosden Farm being removed from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I request confirmation that this protest has been received, registered and read by the planning inspector. I would also like a reply to my two questions. I have sent my objections to Sir Paul Beresford MP.

I object to the fact that GBC has made considerable changes to their April 2016 proposals without full consultation.

Questions:
1) As there is a freedom of information act I request that the minutes of the planning meeting is published in the Surrey Advertiser. I also request that the planning officers and councillors publish the way they have voted. The electorate have a right to know which of their councillors do not care about the lives of the people in their borough.

Will this be done? If not why not?

2) When the village of Shalford was disrupted by the improvements to the A3 compensation was paid to the residents. How much has been put aside for the compensation to the residents of Send Marsh and Burnt Common who will have their quality of life reduced by the increase in noise and pollution?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<th>Comment ID: PSLPP16/3372</th>
<th>Respondent: 15329569 / P.J Kirkwood</th>
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I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners’ views, or the costs involved in improving the infrastructure, currently out side their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1025 Respondent: 15329825 / Sylvia Lodger Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1541 Respondent: 15329825 / Sylvia Lodger Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to new sites (Garlicks Arch) being introduced as an after thought when it was not even considered in the previous plan. A slip road on the A3 at Burnt Common has been added to the Draft Local Plan without Highways England consent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/3385  Respondent: 15329825 / Sylvia Lodger  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to a totally unrealistic number of houses for the country lanes to absorb.

I object to the 2016 Draft Local Plan as it has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3387  Respondent: 15329825 / Sylvia Lodger  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3386  Respondent: 15329825 / Sylvia Lodger  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners' views, or the costs involved in improving the infrastructure, currently out side their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<th>Comment ID: PSLPA16/1027</th>
<th>Respondent: 15330017 / Honor Grear</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more that double the figure used in previous plans. It also fails to take into account the new situation due to Brexit, a factor which makes the local draft now appear hopelessly out of date.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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Objections to the continued inclusion in the Guildford Borough Council Proposed Local Plan (June 2016) of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation the phased development of a new settlement of up to 2100 dwellings

I object to the inclusion of FWA/TFM in the draft Local Plan for the following key reasons:

1. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt FWA/TFM is prime green belt, and was given to the country for an airfield as part of the war effort, based on the promise that the land would be returned to the community after the need for an airfield had passed. This promise has been broken, and no effort has been made to see whether there is a moral or equitable duty to return this land to the existing community.

2. I object to the disproportionate allocation of housing in this particular part of the Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

3. I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties The plan calls for a village of 159 residences (with narrow lanes, no street lights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

4. I object to the detrimental impact on transport, local roads and road I specifically object to:
   a) The assertion that the development will result in a meaningful shift to cycling and The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   b) The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   c) The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   d) The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   e) The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
   f) The lack of suitable public transport The local rail stations of Effingham Junction and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

5. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCl).

6. I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU permitted Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation. In particular, two schools should not be planned in the FWA/TFM area which is known to have poor air quality, which will only be exacerbated by the planned development.
7. I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.

8. I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning Authority. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 9th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Those reasons remain valid, and there are no adequate ways to overcome them.

9. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/3391  **Respondent:** 15330017 / Honor Grear  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to a plan which proposes that over 70% of new housing built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on the protected Green Belt. Election manifesto promises to the electorate are being broken.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/3392  **Respondent:** 15330017 / Honor Grear  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5164  Respondent: 15330017 / Honor Grear  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location
2. It is further from railway stations than any other identified strategic site.
3. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)
4. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc)
5. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.
6. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.
7. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum.
   ◦ The associated traffic increase from the RHS has not been taken into account.
   ◦ The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account
8. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
9. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station
10. It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.
11. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”
12. Opportunity (3) should be common to all sites and is not unique to this site
13. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.
14. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.
15. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)
16. I object to the removal of additional 3.1 ha from the green belt without any justification
17. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact
18. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3
19. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.
20. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.
21. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.
22. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.
23. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.
24. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.
25. I object to the extension of the plan period by 1 year as it has not been identified as a major change.
26. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.
27. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.
28. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.
29. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.
30. I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.
31. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.
32. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.
33. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.
34. I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.
35. I object to the quantity of space allocated for retail in the town centre. This could be much better used for residential development. I particularly object to the reliance on the Carter Jonas study update 2017 which includes “demand” for retail space from companies already in administration.

I consider for the reasons listed above and numerous other reasons that this plan is unsound and not fit for purpose. Indeed, in ordinary words and common language, I believe that this draft local plan, and these revisions, in totality, but in particular relating to Three Farm Meadows are “bonkers”!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objections to Guildford Borough Council Proposed Submission Local Plan: Strategy and Sites (June 2016) and to the continued inclusion on the plan of the former Wisley Airfield, now known as Three Farm Meadows (TFM) - Allocation A35 or the phased development of a new settlement of 2,068 dwellings.

Although I live outside the borough I use the borough for visiting friends who do live there. I object to the Local Plan for the following key reasons:

1. I object to the threat the local plan poses to the historic rural village of Ockham and the blight on properties there.

1. I object to the detrimental impact the proposed development of over 2,000 dwellings will have on a village with 159-residences. In particular this development and the associated increase in traffic will have a very detrimental impact on the environment, road safety and congestion.

1. I object to a plan which proposes that over 70% of new houses are built on land designated as Green Belt land in contrast to election manifesto promises made to the electorate.

I trust that these objections to the Local Plan will be fully considered and that the plans for development on the former Wisley Airfield (TFM) allocation A35 are now removed from the local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1546  Respondent: 15330945 / Richard Hart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As I live close to the Gosden Hill Farm proposals, I am very concerned about the increased traffic movement through Burpham, especially the large Park and Ride area at the proposed new roundabout with only access off and onto the A3 south carriageway. Surely this junction should now be a 4 way route to the South as well as a route North to take vehicles away from Guildford’s Ladymead road and London Road Burpham.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3400  Respondent: 15330945 / Richard Hart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
The proposals to site a new railway station in Merrow will also increase the traffic through the existing congested New Inn Lane and know doubt increase traffic flow down Merrow Lane from the new Gosden Hill estate.

All of these points are the reasons why I object to the current Local Plan and I hope that a review of the proposals will be made.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to the 2016 Draft Local Plan, as at last I have been able to view some of the vital elements of the proposals in the document. The main points that I am concerned over is the mass of housing that is proposed in the Green Belts north of Guildford. Each time I read in the local paper on the possible new areas of housing, it states an ever increasing number of new developments allocated in green areas and do not seem to state any proposals south of Guildford. What happened to the original Council concept that you should first build on Brown Field sites and nearer the town centre if possible. All of this development will bring increased pollution not to mention traffic congestion on our local roads especially the A3. No sensible timing has been stated to the building of any new improvements to this busy trunk road prior to the building of the new roads and houses near-by. What about the upgrading of utility services to serve the new housing, which will no doubt take months to sort out and may effect any major A3 road improvements that are proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
REMOVAL OF AREAS FROM THE GREEN BELT

The Green Belt was granted to areas to prevent urban sprawl, prevent widespread development, further air pollution and flooding whilst providing areas of relaxation for those who live in the cities. The proposed Local Plan allows for large numbers of new homes and other facilities to be developed in Green Belt areas. The National Planning Policy Framework states that such a development requires exceptional circumstances but the Local Plan does not disclose such needs.

Erosion of the Green Belt as set out in the Local Plan will lead to further urbanisation in the future thus adding even further to the development already proposed.

No changes to the Green Belt should be made unless there are exceptional circumstances.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
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<th>15331393 / Maurice Frayne</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

SCALE OF DEVELOPMENT

The Local Plan housing numbers are too high. Combining East and West Horsley together with the new town at the former Wisley Airfield and those at Ripley would completely urbanise the area between the A3 and the A246. In addition, the Local Plan seems to have made no allowance for the infrastructure required to support this massive development.

At present our drains and water supply are challenged at various times during the year, further development would cause failures within both systems. The volume of traffic using the local roads has increased substantially in the past decade, further urbanisation and its consequent increase in vehicle movements on the local roads, A3 and M25 intersections would create further congestion and a substantial increase in air pollution levels to an already highly polluted area.

The nearest station, Horsley, which most commuters would drive to as there is little other public transport, would be unable to cope with the increase in commuters at peak times. Even now it is now difficult on occasions to find parking at either Horsley or Effingham stations.

The existing local medical facilities will be unable to cope with the proposed increase in population. The Royal Surrey Hospital would not have the capacity to cope with the increase in patient numbers created by the proposed Local Plan development.

AVAILABLE DEVELOPMENT SITES

The Local Plan does not take in to account the existing sites still undeveloped within Surrey. There are Brownfield sites available, which have not been developed and would provide enough land to meet the need for affordable local housing. Many commercial sites are unused and should be developed before any planned use of Green Belt land.

I ask Guildford Borough Council to reject the existing plan and review use of Brownfield sites and existing permissions for development rather than the development of precious Green Field sites, which have been nationally recognised as protecting the quality of both our urban and natural environment.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/1034  **Respondent:** 15331489 / Harry Axten  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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**Comment ID:** PSLPS16/1552  **Respondent:** 15331489 / Harry Axten  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/3416  **Respondent:** 15331489 / Harry Axten  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
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Comment ID: PSLPP16/3422  Respondent: 15331681 / Anne Lowndes  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

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Comment ID: PSLPP16/3424  Respondent: 15331681 / Anne Lowndes  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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Comment ID: PSLPP16/3423  Respondent: 15331681 / Anne Lowndes  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
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I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I OBJECT to Gosden Hill development being in the Local Plan. The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the Doomsday Book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever they want.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.
Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1557  Respondent: 15340929 / Claire Smylie  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to make the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which is protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)
It is clear that with this site being added at the 11th hour no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy II)

Furthermore, several electricity pylons run through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPS16/1558   Respondent: 15340929 / Claire Smylie   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

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I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3441   Respondent: 15340929 / Claire Smylie   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3).

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3435  Respondent: 15340929 / Claire Smylie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3437  Respondent: 15340929 / Claire Smylie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3439  Respondent: 15340929 / Claire Smylie  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3467  Respondent: 15340929 / Claire Smylie  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Respondent: 15340929 / Claire Smylie</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy H3</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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</table>

This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/3443</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
</tr>
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</table>
I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

1. I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/3446  **Respondent:** 15340929 / Claire Smylie  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPP16/3448  **Respondent:** 15340929 / Claire Smylie  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPP16/3431  **Respondent:** 15340929 / Claire Smylie  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3433  Respondent: 15340929 / Claire Smylie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the
flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3425  Respondent: 15340929 / Claire Smylie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan.

1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3428  Respondent: 15340929 / Claire Smylie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
I OBJECT to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

2. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

3. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any commonsense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/685  Respondent: 15340929 / Claire Smylie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

. I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4708  Respondent: 15340929 / Claire Smylie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.
11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular pastime, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to...
considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4709  Respondent: 15340929 / Claire Smylie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.
9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3158  Respondent: 15340929 / Claire Smylie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/635  Respondent: 15340929 / Claire Smylie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1039  Respondent: 15340993 / Alexander Piers Plummer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Chilworth

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to object to the proposal in the Guildford Local Plan 2016 to remove Green Belt protection from Chilworth:

1) Chilworth has already had many new houses built in recent years. Further expansion risks destroying the rural nature of the village, which Green belt protection helps to maintain.

2) Expansion at the edges of the village will gradually remove the buffer between Chilworth and the neighbouring villages of Shalford and Albury, resulting in an eventual conurbation with Guildford.

3) The existing traffic levels along New Road are excessive, resulting in high levels of air and noise pollution to those houses along the road. Further development will exacerbate this to unacceptable levels.

I believe that only by retaining Green Belt protection for Chilworth and its surrounding villages can these problems be controlled.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1040  Respondent: 15341153 / Peter Singer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object most strongly to the Horsley villages being taken out of the Green Belt. Many promises have been made to preserve the Green Belt and it should be. It is a rural area and the character of the villages should be maintained.

The Horsley villages have already, during the last few years, had considerable infilling and large areas of new houses built resulting in considerable congestion on the narrow roads, particularly at peak times. It is already almost impossible to park to shop in the village, and the overflow car park is constantly full.

The station car park is also nearly full now, and with the additional houses planned commuters would not be able to park there.

The filter roads off the A3 already have huge tailbacks at peak times, and the pollution levels at the M25 Junction 10 at Wisley are already well above recommended safety levels.

The proposed number of houses to be built would mean a huge strain on the infrastructure, and cause a different way of life for the residents who do not want this. The further possibility of development at Wisley airfield is a complete horror as it would ruin the areas of outstanding natural beauty all around it.

Please reconsider the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
6) I object to all other sites in the Local Plan: Blackwell Farm, 3 Farms meadows, Garlick’s Arch, West Horsley and Hogs Back. All are out of proportion to the local area.

7) Roads, schools, doctors etc will not be able to cope.

8) The consequent increase in traffic, which already is very heavy, with dangerous lorries driving over the speed limit.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPA16/1051</th>
<th>Respondent: 15341441 / Gillian Thorpe</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send</td>
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The 4 policies (A42/A43/A43a and A44) are totally unacceptable for the village and there are far more suitable places for development, especially within Guildford and therefore I suggest GBC considers alternative sites. Send cannot cope with the level of development proposed and any development will have a detrimental effect on the local community and environment.

Please can I request that my comments are shown to the Planning Inspector who will decide on the proposed developments in Send and the surrounding area.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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I object to Policy A42, 45 houses proposed to be built in Clockbarn Nursery, Tannery Lane. Tannery Lane is a country, single access and the staggered cross roads- junction with Send Road is already dangerous, especially during peak times. This will just add to the growing congestion in Send. Planning permission has previously been given for 64 apartments at the Tannery and for building the marina, both of which will generate additional traffic (large vehicles for boats etc) The lane cannot cope with any more traffic.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1597  Respondent: 15341441 / Gillian Thorpe  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A43/A43a - I strongly object to a new interchange with the A3 at Burnt Common as this would generate a huge volume of traffic through the village. It is already congested during rush hours especially with the school on Send Barnes Road. When the northbound lanes of the A3 are congested both in the morning and evening rush hours (which is most weekdays) Send Village is totally congested and then many local drivers speed down country lanes (Potters Lane) to avoid Send Road/Send Barnes Road and drive dangerously. Additional traffic will only exaggerate the situation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1603  Respondent: 15341441 / Gillian Thorpe  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Additional housing at Garlick's Arch will exasperate and add to the local chaos on the roads and the already stretched amenities. I therefore strongly object to building 400 Houses and 7000 sq metres of industrial space at Garlick's Arch. The site floods and is covered by ancient woodland. The industrial is not needed as there are many offices and warehouses sitting idle in the local area. Fill these sites first before developing more empty units. Any new industrial units should be built at Slyfield where there is already an established site and the roads can cope with the traffic. Guildford's housing requirements have been shown to be grossly exaggerated and they have refused to disclose their calculations. With proper use of brownfield sites this Green Belt site is not needed.

In addition to the other proposals, I object to Policy A42, 45 houses proposed to be built in Clockbarn Nursery, Tannery Lane. Tannery Lane is a country, single access and the staggered cross roads- junction with Send Road is already dangerous, especially due peak times. This will just add to the growing congestion in Send. Planning permission has previously been given for 64 apartments at the Tannery and for building the marina, both of which will generate additional traffic (large vehicles for boats etc) The lane cannot cope with any more traffic.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1594  Respondent: 15341441 / Gillian Thorpe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A44- I strongly object to the development of 40 houses and 2 travellers' pitches at Send Hill.

The narrow country lane (Send Hill) would not cope with any additional traffic. It is narrow and already busy with traffic to the cemetery (which has recently been extended). The junction at the bottom of Send Hill with Potters Lane is very dangerous due to speeding traffic off of the A3. Any more traffic would make it even more hazardous. It is an inappropriate location for 40 houses because the road is narrow and single access. Also the soil of the proposed site contains documented unsafe landfill waste registered at GBC. The land is totally unsuitable for dwellings and traveller pitches. I believe the unsafe landfill will be harmful to health of any home owners. Any development there would spoil a high amenity area set in beautiful countryside. The area is used for recreational activities such as walking and would be greatly missed by locals.

Send will not be able to cope with the proposed developments. St Bedes C/E School will shortly be demolished. Currently a new school is being built in the grounds of Send First School. The new infant/middle school when complete will not be able to cope with a large influx of children. There does not seem to be any long term planning in line with GBC proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3540  Respondent: 15341441 / Gillian Thorpe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to Send Village being removed from the Green Belt. The Green Belt was intended to be permanent, as required by the national Planning Policy Framework, and there are no special circumstances to justify abandoning it. Send's Green Belt provides an essential buffer stopping Woking and Guildford becoming one conurbation. Local councillors and central government gave a clear election promise to protect the Green Belt and this reneges on it. Developers will be quick to take advantage and there will be nothing to stop them. There is plenty of brownfield land still available for developing in the Surrey area.
Policy A42 - change to the Clockbarn in Tannery Lane the increase of the number of houses to 60 is totally excessive and will cause chaos in Send which is already at capacity during rush hours. It will impact on the village setting, drainage and local amenities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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there is no proven need to supply pit he's for travelling show people. This is a green belt area which separates two villages. Building on flooded areas, contaminated by lead is not an ideal place for building. As a home owner, I would not wish to purchase a dwelling on such land as it would pose an insurance problem. Again, Send and Ripley cannot operate an excessive new dwellings. The roads and entities would suffer.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This proposal was deleted from the 2014 draft. There has been a decline for industrial land especially after Brexit. Slyfield is an adequate industrial site for the area. There are plenty of unused office buildings in Guildford. Why wreck the greenbelt to add to the glut. The impact of additional traffic and especially large lorries will cause considerable traffic jams in Send and of course the A3 which already cannot cope in the rush hours. The impact on the narrow lanes such as Vicarage Lane, Potter's Lane and Send Hill will be hire delusional for local residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Policy 2 paragraph 4.3.15-this proposal would spoil the countryside and the beauty of the Wey Navigation. Large lorries and a high volume of traffic will find it difficult using the small narrow lanes in the area and of course, cause gridlock in Send. Sadly St Bedes School was closed this year and moved to Send First School on the main road through Send. More industrial lorries and traffic will heighten the likelihood of accidents outside the school plus congestion. There is no room for extra traffic and bad planning.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPS16/1604</th>
<th>Respondent: 15341569 / Rotraud Sarker</th>
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This is to let you know that I am seriously worried and concerned as regards GBC’s draft Local Plan proposals to build new houses on the slopes of the Hog’s Back at Blackwell Farm. This is to express my objection to the proposal which would remove 72 hectares of scenic farmland and woodland and which would increase tailbacks on the A31 and traffic congestion.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>Comment ID: PSLPA16/1053</th>
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| Answer (if comment is on questions 1-7 of the questionnaire): () |

Being a resident of Send Hill I feel it my duty to object to your current plans to this area. I object to the proposal in the local plans on the grounds that Send Hill is a single track country road and therefore would be far too narrow to accommodate the additional traffic your proposed plans would bring, it would also make parking for visitors very restricted and dangerous for children or in my case grandchildren. I also object to the blatant disregard for the respect of green belt policy that needs to be addressed or we will lose the beauty of OUR countryside not only in Send but in other areas that are close to us. I would like to request confirmation of these objections.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<th>Comment ID: PSLPP16/3559</th>
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| Answer (if comment is on questions 1-7 of the questionnaire): () |

We object to the disproportionate level of development planned in one relatively small area of the borough with a lack of detail regarding the essential infrastructure to support this proposed huge development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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<td>We strongly object to the 2016 draft Local Plan for many reasons including the loss of green belt in the area. The distinct lack of evidence for the alleged housing need numbers which at 693 a year is more than double the previous figure quoted in 2012 of 322.</td>
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<td>The limited consultation period is insufficient and a decision must be made about the tunnel proposal before the Gosden Hill development can be advanced any further.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<th>Comment ID: PSLP16/3568  Respondent: 15341857 / Lisa Buxton  Agent:</th>
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We object to Send Village being removed from the Green Belt because:-

- The village provides breathing places for people and for nature.
- We will lose more than just a view, we will lose a space to run or play and an escape from the city.
- We will lose valuable farmland which provides local produce and therefore reduces food miles.
- We lose land that has its own identity and plays its own role in England’s heritage.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3569  Respondent: 15341889 / Allen Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Dear Mr. Taylor, I find it depressing having to write to you to ask that you reconsider the plans to build more houses and to take away our "Green Belt status. You must surely recognise the damage that this ill conceived plan will do to our envirnoment. The Roads in East Horsley are evidence of a deteriorating situation which does not want any extra traffic. Whoever visited the area to sample traffic before proposing the extra houses must have seen the dangers of heavy lorry traffic,cyclists,schools and elderly people trying to cope with roads without markings or "cats eyes" ,regular flooding and poor lighting. The impact of more houses would be creating an atmosphere for oldes people of not being able to "go out" and restricting their movements and a dependency on others for their basic needs. Parking is already at a premium, Doctors Surgeries, Schools and Transport are already struggling and when the cyclists are using the roads one might as well stay in doors.

My wife and family moved here 40 years ago to get relief from an area (Laleham) where similar problems were starting to show. Look at it now. It has completely lost it village status and has become attached to Staines which is pure suburbia. Do you know this area?

I suggest you and your colleagues reconsider the proposed development before it gets out of hand.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1057  Respondent: 15341953 / Betty Bannister  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
My arguments against this work are as follows.

Firstly the one junior school we have is full to capacity. Doctors Surgeries are full with waiting time for appointments. Our roads are too narrow to take anymore lorries or cars, its not safe to walk to the village anymore. Roads flood every year and building more houses on green belt will make it far worse, the rain water has nowhere to drain away from the roads.

Already there are dangerous pools of water which accumulate and more building will exasperate this situation. Our village is too small to accommodate all the additional planned houses.

Please think again.

You say that 40% will be affordable houses, nowhere are we told how much these houses will be. You should state a level at which these affordable houses will be sold.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
2. I OBJECT to building 400 houses and 7000 sq metres of Industrial space at Garlick's Arch, Opposite Send Marsh Road. This is an area of Ancient woodland and very prone to flooding indeed recently over half a million pounds was spent downstream of this location to prevent flooding to houses in Maples Road and surrounding area's. The Industrial space is not needed but could however already be accommodated at Slyfield Park in nearby Guildford. Guildford Boroughs housing requirements have been shown to be grossly over exaggerated, and they refuse to disclose what formula they use to arrive at their calculated requirements. Proper use of Brownfield sites within the Borough should eliminate the need to encroach on such a Green Belts area!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1623  Respondent: 15341985 / William Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3. I OBJECT to a new interchange with the A3 at Burnt Common, because Send would have to try and then cope with traffic from the proposed 2000 new houses at Wisley Airfield, 2000 houses at Gosden Hill, Burpham and 1830 at Blackwell Farm. Traffic on this section of the A3 is already at a standstill during rush hour periods, and all such additional traffic would then flow through send road which is already overloaded. This must be avoided.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1625  Respondent: 15341985 / William Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

5. I OBJECT to the development of 40 houses and 2 travelers pitches at Send Hill. It is an inappropriate location, which would be serviced by a narrow single access Country road. Subsoil at the proposed site contains unsafe landfill waste as registered with GBC.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/3577  Respondent: 15341985 / William Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to Send Village being removed from the Green Belt.

The green Belt was intended to be permanent, per the National Planning Policy Framework and I believe there are no special circumstances to justify abandoning it. Send's Green Belt is an essential buffer between Guildford & Woking stopping it becoming one Urban Mass! Central Government & Local Councillors made a clear election promise to protect the Green Belt and this Plan renegades on the promise given to the electorate. Developers would be quick to seize upon such an opportunity and there would be no policy in place to stop them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/696  Respondent: 15341985 / William Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. GBC HAVE NOT FOLLOWED CORRECT PROCESS WITH THIS LATEST PLAN.

Since 2014 GBC has changed every major site in Send proposed for development, (now standing at some 485 houses and a massive new road junction). These very significant changes should require another full consultation under regulation 18, not a shortcut of Regulation 19 which GBC are attempting to get away with. This undoubtedly invalidates the whole Local Plan Process!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/149  Respondent: 15341985 / William Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal to Inset Send Business Park from Green Belt because:
There is extremely restricted vehicular access along Tannery Lane in both directions. Further development at this location would detract from the openness of the Green Belt and is totally inappropriate and uncalled for.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1550  Respondent: 15341985 / William Walker  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A42 change at Clockbarn in Tannery Lane because: It ignores all previous objections by residents, and is a 33% increase in homes over and above the original ill conceived plan. Which would exacerbate existing traffic and flooding issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1551  Respondent: 15341985 / William Walker  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A43 change at Garlick's Arch because:
It ignores the thousands of previous objections made by local people. It will cause extensive over development of our village and the number of homes is excessive. It will generate more traffic which will not only block up the local roads of Send and Ripley, but also the major A3 trunk road into Guildford which already struggles to cope with current traffic levels during rush hour periods.
It is also a flood zone 2 allocated area, and subject to frequent flooding. There is also no proven demand for Travelling Show-people plots in this location.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1552  Respondent: 15341985 / William Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A58 at Burnt Common because:

It was deleted from the 2014 draft because of previous objections. There is no proven reason to have more industrial and Warehouse development in the middle of the Green Belt, when Slyfield and Guildford still have empty sites and industrial units. This amounts to a huge over allocation of industrial land, in the middle of the Green Belt, given the current decline in demand for such industrial premises within the Guildford area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3248  Respondent: 15342113 / Jane Carwardine  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Surely with Brexit it is possible that all this housing will no longer be necessary and this plan will just make a lot of money for an already wealthy few.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3247  Respondent: 15342113 / Jane Carwardine  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to removing the Horsley's from the green belt. Our country is very overcrowded already, particularly in the southeast and the green belt was created by some foresighted government to protect the environment around London for all. It should therefore be sacrosanct. It serves as London's lung. We have seen how other policies supposedly to cut carbon emissions by encouraging people to buy diesel cars has now been proven to have made London one of the most polluted cities in Europe. How short sighted governments can be to reach so called targets!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Station Parade being classified as a District Centre. In my opinion it is not appropriate as a place for more urban development

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2. Wisley Airfield.

I object to the building of 2000 house on the Wisley airfield. I previously thought it might be a reasonable proposal to build on an old brownfield site but the scale of the plan will have an enormous impact on our narrow country roads and make train travel at peak times intolerable. It is almost at capacity already and where will the extra cars park.
I object to the building of 2000 houses on the Wisley airfield. I previously thought it might be a reasonable proposal to build on an old brownfield site but the scale of the plan will have an enormous impact on our narrow country roads and make train travel at peak times intolerable. It is almost at capacity already and where will the extra cars park?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the proposed change to the Settlement area. Our village and locality will become just an extension of Greater London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

1. Changes in the boundaries will make future building beyond this plan able to encroach on more green spaces.

I object to the proposed change to the Settlement area. Our village and locality will become just an extension of Greater London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
5. Station Parade should not be a district centre

I object to Station Parade being classified as a District Centre. In my opinion it is not appropriate as a place for more urban development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3586  Respondent: 15342113 / Jane Carwardine  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3. No infrastructure planned.

With an estimated increase of 35% of households we do not have the school places, medical facilities or drainage in place or in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3584  Respondent: 15342113 / Jane Carwardine  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Having objected in 2014 I would like to make my voice heard again in connection with the new proposals for the local plan and how I see it affecting my local environment and community.

1. **Removal of the Horsleys from the green belt**

I object to removing the Horsley's from the green belt. Our country is very overcrowded already, particularly in the southeast and the green belt was created by some foresighted government to protect the environment around London for all. It should therefore be sacrosanct. It serves as London's lung. We have seen how other policies supposedly to cut carbon emissions by encouraging people to buy diesel cars has now been proven to have made London one of the most polluted cities in Europe. How short sighted governments can be to reach so called targets!

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6. **Brexit may result in less houses being needed in the future.**

Surely with Brexit it is possible that all this housing will no longer be necessary and this plan will just make a lot of money for an already wealthy few.

Please send these points of objection to the independant inspector.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I strongly object to the development of Normandy/Flexford and the potential development of 1,100 homes.

My thoughts are as follows:

I have lived in Normandy for all my life (now I'm 25 years old) I have up till now been living with my parents. But I am now moving out and will be buying a house within the lovely quiet countryside village of Normandy. I have always aspired to buy my first home here.

BUT now I have seen Guildford Borough's plans and I am deeply saddened and worried. Makes me want to move out of the village to be honest! As if building on the green belt is not bad enough they are proposing to completely change and definitely ruin our village! We don't want the extra housing or infrastructure here. We live in a small countryside village and that's why everyone moved here. People compliment the area saying 'it's so quiet round here' or say 'the countryside is lovely' not 'glad we got that housing estate to meet the councils targets'. Maybe Guildford Borough Council can give people all their money back on their properties in Normandy? Because most of the properties round Normandy were sold to people under the description of 'set in a small countryside village' and now they want to change that?!

From growing up and spending quite a few weekends of my life on the land they propose to build on I can confirm a lot of wildlife/beautiful scenery would be lost. And how exactly would the Grade 2 listed Queen Ann house be suited to be directly opposite 1,100 houses? Also Parwood Equestrian Centre? Next to a housing estate? Makes me laugh in a way as the proposal is so out of place. The council are acting with no due care and attention. I feel Normandy is an easy target for them as quite a few elderly people live there and they are bound to not be able to kick up as bigger fuss as say a proposal in Tongham where younger couples live and where there is a higher concentration of people.

Normandy's green belt should be protected, and if anything the site should be turned into a nature reserve!

I am really angry at Guildford Borough council to be honest. They spend all this money putting up signs in the village about the Surrey hills and say how it's an area of natural beauty then they want to create a concrete jungle not even a mile down the road! I think I could come up with about 10 better sites for this development and I'm not even employed by them.

- Flexford was once called Flaxford, itself a corruption of "flax vard", meaning flax meadows by a stream. Through the proposed development you would completely remove what the area once stood for. Do you really propose to remove the meadows from Flexford?

- I am personally unable to see a demand for a secondary school, a lot of the children around the area go to Ash Manor which is a mile or so down the road or travel into town on the train or get the school bus which comes around the houses. Maybe we should expand the existing schools to cope with the extra demand? You do not live in the countryside and expect to have a Secondary School next door to you. Furthermore Ash Manor and Guildford County are UNDER SUBSCRIBED!

- The development is just too close to an Area of Natural Beauty. You should not build right up to the edges of this area just because you can.

- The development really does not fit in with the local area. One property that comes to mind is the listed Queen Ann House on the same road you propose this development. To me this would ruin the history behind this wonderful property.

- You just can't double the size of a small village such as Normandy, it's not morally right or fair on the people who current live in the village. Even if you drastically reduce the number of homes you are still doubling the size of this small community.

- Building on the land would mean getting rid of a lot of precious rare wildlife and ancient woodland and this in itself would be horrible to see.

- You would be essentially de valuing a lot of the properties that are nearby the proposed development. No one wants their back garden backing onto a housing estate.
- You would be "Turning Rural pasture into a urban ghetto"

- People moved to Normandy to live in a quiet countryside village, not the concrete jungle the council propose. You can not change the entire characteristics of a small village just to meet government demands.

- I know for a fact every single resident when asked about the development and if they would favour it on the basis it would bring a pub or shop, would certainly say they would rather not have a shop or pub if it means saying goodbye to the greenbelt. To base a supporting argument on the fact it will bring more facilities is rubbish to me. Like most normal people I travel to a supermarket in the car each week or take a short bus ride to a shop down the road. Most people in Normandy are over 65 so this is free for them!

- We already have a pub but it's disused and currently empty - through not enough customers. It is not right to increase the population in the village just to bring in the facilities.

- This proposal is no different to Wisley Airfield proposal that was denied.

- I feel the council should not be wasting precious time on a proposal like this.

- A secondary school in Normandy would to me be extremely out of place, its not suited to a countryside location.

- Traffic is already bad enough on the Aldershot Road - It is an absolute nightmare every evening/ morning especially by where you propose the development. The traffic will often queue all the way to Ash Station from Wyke Church. There is also no way to relieve this with a new road structure.

- I also note the proposal has an affordable housing element. Normandy is not about affordable housing, you aspire to live here. Put it this way I'm 25 and personally feel the housing on offer to young people in Guildford is adequate. Affordable housing in Normandy is like building flats on the Wentworth Estate.

- Normandy is a quiet country village and you should not be allowed to change that. It's been like that for thousands of years. I know the population is growing but we simply can NOT ruin Villages like Normandy for future generations.

- The proposed development would seriously harm the openness of the Greenbelt in the Area.

- In my eyes you need to develop out the towns or develop existing Brownfield sites. You just can't put such a huge development on a tiny historic village such as Normandy/ Flexford. We should preserve our history.

I do hope you re consider this planned development and take my thoughts into consideration. I don't want to raise my future children in what the council propose and pray for them to be able to experience what has made Normandy so special to me.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/947  Respondent: 15342305 / Redmond Neale  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I would like to object the changes to policy P2 for the following reasons:

- I object to the changes to Policy P2 because they have not addressed many of the 32,000 comments made to the 2016 plan.

- I object to the new para (1) “The Metropolitan Green Belt will continue to be protected as shown designated on the Policies Map, against inappropriate development. In accordance with national planning policy, the construction of new development will be considered inappropriate and will not be permitted unless very special circumstances can be demonstrated.” The words “as shown designated on the Policies Map” should be deleted. The Policies Map has effectively ignored huge areas of Green Belt protection and the new para (1) is therefore a sham.

- I object to the proposed change that Normandy settlement, Flexford settlement and Walden Cottages should be inset from the Green Belt due to the fact that:

  - There is evidence in past planning appeals APP/Y3615/W/15/3002308, APP/Y3615/A/10/2140630 and APP/Y3615/A/10/2131590 that the land here contributes to the “openness” of the Green Belt

  - There is evidence in the Sustainability Appraisal para 10.4.7 that the agricultural land between the settlements is of BMV quality, exhibits ‘openness’ and contributes to the rural economy

  - The land in and around the settlements of Normandy and Flexford contributes to views into and from the Surrey Hills AONB (Hog’s Back)

Policy P2 fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it needs to be permanently protected. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land.

• Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital.

• It is incorrect to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of land that may be removed from the Green Belt.

I object to the statement in the submission Local Plan under Green Belt Policy P2 (4.3.13) which claims that Normandy, Flexford and a further list of 12 villages are “now inset from the Green Belt”. This statement is untrue as GBC is proposing to “inset” these villages. No decision has been made by an Inspector, therefore the villages remain in the Green Belt.

• I object to the changed “insetting” of 15 villages from the Green Belt, and at “infilling” 12 of the borough’s Green Belt villages.

• I am concerned that settlement boundaries are to be hugely extended in many villages and that infilling is also proposed outside the settlement boundaries of 11 further villages. This is completely unplanned and unmeasured development outside the OAN.

Many Guildford villages are elongated in outline, reflecting the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPA16/1063</th>
<th>Respondent: 15342401 / M.J. Harris</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high

0 The "objectively assessed need" figure of 693 homes a year is too high.

0 A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.

0 The current SHMA inflates the proposed housing figure due to
failure to correct for errors in the historical data for international migration flows,
issues with the way it considers students and affordability and
Flaws in the method for estimating the number of homes needed to support job growth.
It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan's proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2885  Respondent: 15342401 / M.J. Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Gosden Hill development being in the Local Plan. The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going
back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, 82215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham's sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around
14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England's requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an "aspiration" in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the inclusion of the land at Garlick's Arch, Send Marsh/Burnt Common and Ripley

Garlick's Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (Blc), general industrial (B2) and storage and distribution (BB).

There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick's Arch site.

There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council's own Green Belt & Countryside Report does not address Garlick's Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy 13).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy 03).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy 14)

It is clear that, with this site being added at the 11th hour, no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy 11)

Furthermore, several electricity pylons run through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

1. **I OBJECT** to the inclusion of the land for new on/off ramps at Burnt Common. The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of 'through' traffic.

The route fromondon/M25 to Woking would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

1. **I OBJECT** to the damage to the historic environment as a result of the scale of the proposed development.

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick's Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I OBJECT to the sustainable employment policy

If developed, the new employment site at Garlick's Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick's Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick's Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1**

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

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**I OBJECT to the loss of rural employment**

Policy ES supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick's Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3645  Respondent: 15342401 / M.J. Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Policy E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor "attractions" and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/"Disneyfication". Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many "leisure and visitor attractions" already. The case for creating more is not made and no examples are given. Instead, the plan's explicit priorities should be:

1. To protect the borough's prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

1. To help make Guildford's river landscape less off-putting and support town-break packages for high-value To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

1. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An "English town break" (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.
1. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3617  Respondent: 15342401 / M.J. Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT (POLICY H1 Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan peri It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council's timidity is a case of "regulatory capture" by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog's Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3642  Respondent: 15342401 / M.J. Harris  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E6 - Rural Exception Homes

I OBJECT this is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the "mix" this can include "market" housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove "exceptional circumstances."

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3610  Respondent: 15342401 / M.J. Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.
With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists pass through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to the lack of proper infrastructure planning for sites

Policy 11 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick's Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents' in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick's Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.
Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital. Where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/3614  **Respondent:** 15342401 / M.J. Harris  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/3615  **Respondent:** 15342401 / M.J. Harris  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I OBJECT to poor air quality concerns

Paragraph 4.6.27 of the Plan states that "Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health." The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3602  Respondent: 15342401 / M.J. Harris  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick's Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages, as mere housing need does not constitute a 'special circumstance' for the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC's Green Belt & Countryside Report does not address Garlick's Arch, so there is no evidence base to support including this site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3604  Respondent: 15342401 / M.J. Harris  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to development in areas which are at risk of flooding

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough's identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick's Arch (A43) is identified on the Environment Agency's flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council's SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding.

Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3598  Respondent: 15342401 / M.J. Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.
The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hillare are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The borough wide strategy is poorly consi It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The Housing number is based on pre-Brexit data for economic and population growth, including migrati These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the "West Surrey" tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, "West Surrey" is much too small. Half of Guildford borough's residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside "West Surrey". Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justificati on to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make "West Surrey" reliable. The area is artificial, and so therefore are the housing numbers.
derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour's "need". Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID:</th>
<th>PSLPS16/1636</th>
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<th>15342465 / Evelyn Walker</th>
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<tr>
<td>Document:</td>
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<td>I OBJECT to building 400 houses and 7000 sq metres of Industrial space at Garlick's Arch, Opposite Send Marsh Road. This is an area of Ancient woodland and very prone to flooding indeed recently over half a million pounds was spent downstream of this location to prevent flooding to houses in Maples Road and surrounding area's. The Industrial space is not needed but could however already be accommodated at Slyfield Park in nearby Guildford. Guildford Boroughs housing requirements have been shown to be grossly over exaggerated, and they refuse to disclose what formula they use to arrive at their calculated requirements. Proper use of Brownfield sites within the Borough should eliminate the need to encroach on such a Green Belts area!</td>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44</td>
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3. I OBJECT to a new interchange with the A3 at Burnt Common, because Send would have to try and then cope with traffic from the proposed 2000 new houses at Wisley Airfield, 2000 houses at Gosden Hill, Burpham and 1830 at Blackwell Farm. Traffic on this section of the A3 is already at a standstill during rush hour periods, and all such additional traffic would then flow through Send Road which is already overloaded. This must be avoided.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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I OBJECT to building 45 houses at Clockbarn Nursery, due to inadequate access and traffic volumes. The junction with Send Road is already very hazardous for vehicles trying to join the main road. Planning permission has already been given for 64 apartments further along along Tannery lane which will generate additional heavy traffic. This now additional housing would compound an already dangerous situation.

5. I OBJECT to the development of 40 houses and 2 travelers pitches at Send Hill. It is an inappropriate location, which would be serviced by a narrow single access Country road. Subsoil at the proposed site contains unsafe landfill waste as registered with GBC.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I OBJECT to Send Village being removed from the Green Belt.

The green Belt was intended to be permanent, per the National Planning Policy Framework and I believe there are no special circumstances to justify abandoning it. Send's Green Belt is an essential buffer between Guildford & Woking stopping it becoming one Urban Mass! Central Government & Local Councillors made a clear election promise to protect the Green Belt and this Plan renegades on the promise given to the electorate. Developers would be quick to seize upon such an opportunity and there would be no policy in place to stop them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

6. GBC HAVE NOT FOLLOWED CORRECT PROCESS WITH THIS LATEST PLAN.

Since 2014 GBC has changed every major site in Send proposed for development, (now standing at some 485 houses and a massive new road junction). These very significant changes should require another full consultation under regulation 18, not a shortcut of Regulation 19 which GBC are attempting to get away with. This undoubtedly invalidates the whole Local Plan Process!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A42 change at Clockbarn in Tannery Lane because: It ignores all previous objections by residents, and is a 33% increase in homes over and above the original ill conceived plan. Which would exacerbate existing traffic and flooding issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>It ignores the thousands of previous objections made by local people. It will cause extensive over development of our village and the number of homes is excessive. It will generate more traffic which will not only block up the local roads of Send and Ripley, but also the major A3 trunk road into Guildford which already struggles to cope with current traffic levels during rush hour periods. It is also a flood zone 2 allocated area, and subject to frequent flooding. There is also no proven demand for Travelling Show-people plots in this location.</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>It was deleted from the 2014 draft because of previous objections. There is no proven reason to have more industrial and Warehouse development in the middle of the Green Belt, when Slyfield and Guildford still have empty sites and industrial units. This amounts to a huge over allocation of industrial land, in the middle of the Green Belt, given the current decline in demand for such industrial premises within the Guildford area.</td>
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I OBJECT to building 45 houses at Clockbarn Nursery owing to inadequate access and traffic volume. Tannery Lane is far too narrow to take any more traffic. The junction with Send Road is already very hazardous for vehicles trying to join the main road. Planning permission has previously been given for 64 apartments at the Tannery and for building the Marina, both of which will generate additional heavy traffic. The junction is too dangerous already and will make it much worse.

The plan appears to be ill-though through and wholly irresponsible as it would have the following impact on the local community:

- Threat to area of natural wildlife and beauty
  - Ongoing threat of total erosion of the Green Belt and the wildlife it encompasses
  - Destruction of a tranquil, peaceful environment
- Disruption during the construction phase
  - Noise from building work
  - Roadworks causing intolerable traffic congestion
  - The construction of trenches along Tannery Lane for additional drainage, electrical services and supply of mains gas (there is no supply of mains gas along Tannery Lane and beyond - residents are instead reliant on oil or LPG).
- Concerns of additional traffic, which would cause gridlock as the narrow lanes are ill-equipped to
  - Tannery Lane - when driving, care is required with pedestrians, where there is no Turning out of Tannery Lane into Send Road can be extremely hazardous as large vans tend to park close to the junction obstructing the view of traffic to the right and left. The junction would benefit from a mini roundabout. This situation is bad enough with existing traffic - it would become intolerable with extra traffic generated.
  - Papercourt Lane would become a rat-run - narrow passing points on blind bends - cars frequently have to pull over or reverse into passing points to allow traffic to pass through. My car was recently damaged by a large SUV which was struggling to get past it.
  - Newark Lane access into Ripley Village is narrow and barely copes with current traffic levels. The road was built in an era where vehicles were much narrower - today wide 4 wheel drive vehicles struggle to get past. There is no opportunity to increase the road width due to the proximity of legacy housing to the narrow pavements. Newark Lane towards Pyrford is narrow and twisty - even now extreme care has to be taken with cyclists and turning right into Warren Lane is currently very hazardous due to a blind bend, on a steep hill. Additional traffic levels would make driving along Newark Lane intolerable.
  - Send Road - even with existing traffic levels extreme traffic congestion was recently encountered towards Old Woking when temporary traffic lights were installed. With higher traffic volumes this gridlock would become intolerable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to building 400 houses and 7000 sq metres of Industrial space at Garlick's Arch, opposite Send Marsh Road. The site floods and is covered by ancient woodland. The industrial space is not needed but if it were it should be at Slyfield. Guildford's housing requirements have been shown to be grossly exaggerated and they have refused to disclose their calculations. There is already great pressure on local school and medical provision and this can only worsen. With proper use of brownfield sites this Green Belt is not needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1647  Respondent: 15342529 / Lesley Peed  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to a new interchange with the A3 at Burnt Common because Send would have to take traffic from the proposed 2000 new houses at Wisley Airfield, 2000 houses at Gosden Hill, Burpham and 1850 at Blackwell Farm. Much of this traffic to and from the A3, M25, Woking and Guildford would go through Send. Send Road, which is already overloaded, would become gridlocked. Noise and pollution levels, already at excessive levels, would worsen. This must be avoided.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1646  Respondent: 15342529 / Lesley Peed  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the development of 40 houses and 2 travellers' pitches at Send Hill. It is an inappropriate location because the narrow width single access country road provides insufficient access. The subsoil of the proposed site contains documented unsafe landfill waste registered at GBC. Any development there would spoil a high amenity area set in beautiful countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/3603  Respondent: 15342529 / Lesley Peed  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Send Village being removed from the Green Belt. The Green Belt was intended to be permanent, as required by the National Planning Policy Framework and there are no special circumstances to justify abandoning it. Send's Green Belt provides an essential buffer stopping Woking and Guildford becoming one conurbation. Local councillors and central government gave a clear election promise to protect the Green Belt and this reneges on it. Developers will be quick to take advantage and there will be nothing to stop them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1648  Respondent: 15342657 / Ann Cameron  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Inadequate notification and planning for Developments 43 and 43a

The developments on Land a Garlick’s Arch were not included in the Draft Local Plan 2014, and it is only in the Draft Local Plan 2016 that I first learnt of them. Therefore, I object because it is unfair to make such a major change to the Plan with so little prior notification, and allow such a short consultation period of only 6 weeks.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3612  Respondent: 15342657 / Ann Cameron  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Transport

Your Transport 2016 report states “Existing road and parking infrastructure is already inadequate or under pressure and would worsen with the planned development, reducing quality of life, particularly in... Send, particularly Potters Lane, ...”. Therefore, I object because all the proposed developments in Send (A42, A43, A44, and particularly A43a) with have an signifcant negative effect on the transport infrastructure, which your consultants say is already inadequate.

Sustainability

I object to all the proposed housing developments in Send (A42, A43, A44) because they will all promote the opposite of “encouraging sustainable forms of transport”, “conserving landscape character”, and “providing housing to meet local needs”, and most of the other Sustainability criteria. I object because, obviously as a resident ,I can see for myself that local amenities at present are either inadequate or under strain, and therefore will not meet the required Sustainability criteria with the influx of another thousand or so people. The Sustainability report 2016 seems just to pay vague lip-service to GBC plans, rather than being properly fact-based, truthful, and pragmatic on these matters.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

Please taking into account my objections listed below, and draw my objections to the attention of the Planning Inspector.

Green Belt

I object to the proposals to inset from the Green Belt the villages of Send, Send Marsh/Burnt Common, and Ripley, because (given the proposed developments in them, and the huge developments planned close by at Wisley and Gosden Hill Farm), the first three NPPF main guidelines on preserving the Green Belt are not being adequately observed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I refer to the above Plan and the proposal to build approximately 2,000 houses on the site of the former Wisley Airfield.

I wish to strongly object to this proposal on the basis of creating the equivalent of a new town on Green Belt land. Government Policy states that the use of Green Belt land can only be used in exceptional circumstances and this certainly has not been demonstrated.

If considered, this proposal would have a major impact on the villages of West and East Horsley. This forced growth policy would put an enormous strain on existing infrastructure in an already over-crowded area. Our roads, or lanes, are worn out, the existing sewers and drainage systems have difficulty coping. Our schools are overcrowded, our Doctor's surgeries struggle to cope and our few shops have limited parking. The nearest stations would be Horsley and Effingham Junction and they are both well served and their car parks are full.

It must remain a Policy to preserve the natural beauty of our area and to build houses and create a new town in such a rural area would be negligent, and therefore to this end I must strongly object.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to policy A42

Tannery Lane is a narrow country lane which already suffers from too much traffic using it. To build 45 new homes on the Clockbarn Nursery site would cause even more traffic congestion in the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1650  Respondent: 15342753 / Mike Milne  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy A43

The land at Garlicks Arch is covered in ancient woodland with some of the trees dating back as far as the sixteen century.

The wildlife and fauna is prolific in this area and it is a major part of the green belt which must be protected.

This area also allows for natural drainage of surface water.

The National Planning Policy Framework prevents the merging of settlements and if this development was allowed then it would contravene that policy.

The infrastructure is not in place to accept such an increase in traffic.

The local area is already at breaking point at peak periods and this development would virtually bring the area to a standstill at peak times.

The doctors surgery could not take all of the predicted numbers of new people moving into the area.

The local schools would be in the same position as the doctors surgery, with more people than it could cope with.

Guildford Council have just refused planning permission for nine dwellings on Oldlands Field Yard, planning application number 16/P/00783, which is part of the Garlick's Arch site. All of the reasons for refusal given by the council for this development must surely then apply to the whole of the Garlick's Arch area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1651  Respondent: 15342753 / Mike Milne  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy A43a

We do not need an on/off ramp at Burnt Common. This will not alleviate the traffic in the local area. In fact quite the opposite it will increase the traffic problems in the area.

A south bound slip road onto the A3 at the Ripley roundabout could ease the traffic situation. The area for this slip road was made available when the Ripley by pass was originally built but the slip road was never put in.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1641  Respondent: 15342753 / Mike Milne  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy A44

The land to the west of Winds Ridge is a disused land fill site. It was filled with unsafe waste which was noted by Guildford Borough Council. Apart from the fact that the ground is full of unsafe waste and should not be disturbed, Send Hill is a narrow country road and does not provide suitable access. Further development around Send Hill would add to the traffic problem that already exists in the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3606  Respondent: 15342753 / Mike Milne  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to policy P2

Send should not be removed from the Green Belt. Currently Send provides the only buffer between Guildford and Woking. If taken out of the green belt then Guildford would be allowed to merge into Woking. The Green Belt must be protected and preserved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3607  Respondent: 15342753 / Mike Milne  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the erosion of any Green Belt

I object to any "in-setting" of any villages from the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3616  Respondent: 15342753 / Mike Milne  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy P2

Send should not be removed from the Green Belt. Currently Send provides the only buffer between Guildford and Woking. If taken out of the green belt then Guildford would be allowed to merge into Woking. The Green Belt must be protected and preserved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3618  Respondent: 15342753 / Mike Milne  Agent:
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<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I object to the erosion of any Green Belt

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

I object to the lack of any evidence for the alleged housing needs

We have voted to leave the E.U. and so we will be able to control the number of people entering the UK. We need to realistically re-assess our housing needs. I do not believe that we need to build on every piece of land just to appease the current government's wishes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<thead>
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<th>Comment ID: SQLP16/700  Respondent: 15342753 / Mike Milne  Agent:</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
I object to the lack of evidence for the alleged housing numbers

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1061  Respondent: 15342881 / Caroline Southall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I am writing regarding the revised local plan you have recently published which, despite its volume (no doubt designed to befuddle those who elect you), appears to wholly ignore earlier feedback and to contain fatal flaws.

Firstly, as regards likely population demands, your projections (such as they are) need to be re-visited in the light of Brexit. Your proposal for up to 533 new homes in the Horsleys with possibly another 2,000 on the Wisley site (under two miles away) would represent a disgraceful urbanisation of what is still a predominantly countryside area, with little thought given to the infrastructure consequences and certainly no guarantees that these will all be addressed in advance of any building.

Your papers also contain comments on the type of housing that you would wish to see in the Horsleys. Here again your approach is flawed as 533 new homes of the type you describe would be wholly out of keeping with the village. It is an observable fact that many Horsley houses are large and on large plots and that is why people have bought them. Furthermore, you reflect this fact in the heavy Council tax bills we pay from which Horsley residents derive few benefits.

You need a major re-think and a concentration on the more than adequate brownfield sites in the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3619  Respondent: 15342881 / Caroline Southall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Stated Government policy is that areas should only be taken out of the Green Belt in exceptional circumstances and you have not demonstrated that those circumstances apply in the case of the Horsleys. It is accepted that on your planning watch you have permitted some infill development in the main East Horsley village, but south of the A246 there have been no extra dwellings in decades. Indeed, you have previously advised us that the Warren and Rowbams Way are in an Area of Outstanding Natural Beauty - i.e. the Surrey Hills. In the circumstances, how can you possibly permit a re-designation from AONB status to a planning free-for-all; that would be an act of quite inexcusable planning vandalism?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<tr>
<th>Comment ID: PSLPP16/3634</th>
<th>Respondent: 15343425 / Pat Owen</th>
<th>Agent:</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- As residents of East Horsley we know how difficult it is to get an appointment at the Medical Centre without a few days wait and even longer if wanting to see a specific doctor. With the current shortage of general practitioners how guaranteed is it that additional doctors will be found to staff the medical centre?

We both have to travel to London currently for medical reasons and know how difficult it is to get a parking space after 10.30am. How will the car park cope with the extra commuter cars from the proposed developments? How do you plan to enlarge Horsley Station car park? We do not have the problem of worrying about local schools but one of our sons has that problem and has no option but to send his children to private school because of the over-subscribing of places.

- The roads around the area are in an appalling state numerous pot holes. Drainage is poor in many places. A couple of years back we had such flooded roads that it was impossible to get to Cobham whichever route was taken due to flooding. Wear and tear on the road will increase and certainly with huge haulage vehicles backwards and forwards in the development stages residents lives can only get worse and accidents will occur. The narrow roads in the area are

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/3641</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The narrow roads in the area are already congested and the large number of cyclists together with haulage vehicles should be a cause for concern.

- Station parade has been designated a "District Centre" - when did this come about and what does it mean for future development?

- The development of 2,000 houses at Ockham (Wisley Airfield) would have an enormous impact on the facilities available in Schools, medical centre, parking all will be affected. The total number of houses which GBC proposes to be allowed in their plan is far greater than those that should be needed according to official national estimates for population growth in the Borough. How did GBC arrive at a figure that is 70% higher than the official national estimate?

Overall the proposed plan is over-ambitious and badly thought through and does not take into account the unique area in which we live. We accept that more houses need to be built to cater for the demand but a very large housing estate will only badly affect the environment and facilities of which there are problems already with the current number of residents. The planners need to rethink this before they destroy this lovely area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I write to voice our objections to the development plan for the Horsleys. The plan to develop a massive 593 new houses in the area over the next 5 years seems to be out of proportion with the national estimate for population growth. It will have a detrimental affect on schools and medical facilities and will massively change the feel of the green belt area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
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<th><strong>Comment ID:</strong> PSLPS16/1666</th>
<th><strong>Respondent:</strong> 15343713 / Sara Frohmader</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object strongly to the building at Garlick's Arch which is covered in ancient woodland. This land should be protected by the NPPF which prevents the merging of settlements.</td>
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<td>I also object to the slip roads at Burnt common as the A247 is already a very busy road and dangerous to cross. It would cause a 'rat-run' through Send.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td><strong>Attached documents:</strong></td>
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</tbody>
</table>
I also object to the proposal to build 40 new houses and travellers pitches on Send Hill (A44). This is a small lane with lovely views. The walk to the Church is enjoyed by many residents and it would be totally out of keeping in this environment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3649  Respondent: 15343713 / Sara Frohmader  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have lived in Send for over 50 years and always enjoyed it's peaceful, semi-rural setting with the green belt acting as a buffer zone between the towns of Woking and Guildford.

I therefore strongly object to the destruction of the green belt which undermines the Governments commitment for its protection! The sheer number of houses including the industrial units would urbanise and change this area completely!

I urge you to reconsider the plan which would in turn destroy our village and the surrounding countryside and keep send and send marsh in the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1670  Respondent: 15343745 / Stephanie Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A42 - Clockbarn Nursery, Tannery Lane

I object to the development plan under policy A42. This area, especially the road infrastructure, cannot cope with the further development. The lane and junction with Send Road is simply too small and the added traffic volume will only serve to further congest the area.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1667  
Respondent: 15343745 / Stephanie Harris  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A43 & A43a - Land at Garlick's Arch, Send Marsh/Burnt Common and Ripley

I object to the housing and industrial developments proposed under policies A43 and A43a. The existing road infrastructure, local medical centre, school and shops would be completely overwhelmed. The new slip roads and junction would funnel traffic to Woking, it would become a complete bottleneck - thereby raising a completely new problem. The lovely countryside feel of the area would be lost. Please consider developing brownfield sites as part of industrial development.

I am also questioning the process under which Guildford Borough Council are consulting. These are new developments and therefore should be subject to a full consultation under Regulation 18. Consulting via Regulation 19 in this manner feel like a cheat.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1668  
Respondent: 15343745 / Stephanie Harris  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A44 - Land West of Winds Ridge and Send Hill

I object to the development plan under policy A44. This site has also not been previously consulted upon. It is a small area of lovely green belt countryside, the development would completely spoil the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to the following GBC policies: S1, S2, H1, H2, H3, P1-5, E5-7, E9, D4, L1, P12, P13, P14.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLP16/3651  Respondent: 15343745 / Stephanie Harris  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P2 - Removal of Send from the Green Belt

I object to removal of areas of Send village from the green belt. This is all we have as protection against becoming part of Woking and Guildford. It is a lovely haven between the two. If this is removed, the areas will simply merge over time, again spoiling the area. My partner and I will be forced to consider moving away; we chose to live here due to it being away from these urban areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLP16/3652  Respondent: 15343905 / Ian Dwyer  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the following GBC policies: S1, S2, H1, H2, H3, P1-5, E5-7, E9, D4, L1, P12, P13, P14.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1669  Respondent: 15343969 / Mark Hebberd  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I am writing with regards to the building proposals for the Horsleys and Wisley Airfield/Ockham and my objections to them.</td>
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<td>My reasons for doing so are the following:</td>
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<tr>
<td><strong>Wisley Airfield</strong></td>
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<td>I object to the development of 2000 extra houses being built. The local roads and public transport at peak times are already at capacity. The A3 being the closest main road in and out of London is already regularly congested, if not at a standstill in both directions during rush hours, as is the A25 that connects the area with Guildford. The winding country back roads are also certainly not made for large numbers of cars. Adding more traffic to the area will not only make this undoubtedly worse, but will also increase pollution and disrupt more wildlife around the greenbelt area.</td>
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<tr>
<td>The trains are also at peak time capacity. The car park at Effingham Junction (the closest station to the suggested site for building) is already full daily, with commuters parking dangerously and most probably illegally on nearby roads. The trains themselves are full already. The villages are not places that attract many work opportunities (nor should they become so), so residents of the proposed establishments would need to travel to work in some capacity.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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| Attached documents:
Comment ID: PSLPP16/3655  Respondent: 15344001 / Alex Paton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Infrastructure

Increasing the the population of the local area by up 35% would require more schools, medical centres and drainage to name a few. Nothing about these developments have been mentioned in the plans. The schools are already full and the medical facilities are stretched with the current population,

To summarise my objections, I have serious worries for the following with the proposed building plans:

- Detrimental effects on already full public transportation, roads, and local car parks
- Detrimental effects on wildlife
- Detrimental effects on the village community

Air pollution becoming worse in the local area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3654  Respondent: 15344001 / Alex Paton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Extension of the boundaries of the settlement areas of the Horsleys & proposed removal of the Horsleys from the Green Belt

I object to the proposed changes. The Greenbelt sites are essential for keeping the air around London clean, acting as a home and refuge for wildlife. The pollution levels in Greater London already far exceed the targets for clean air each year. Removing the surrounding greenbelt sites will only make this worse and the air more heavily polluted. It will also turn our village into essentially just another extension of Great London. To stress the point again, this would have a devastating impact on our air, wildlife, and also the village community here

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/3657  **Respondent:** 15344065 / Ian Hills  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Apparantly the villages around Guildford are to be removed from green belt status allowing for the possibility of new housing to be built around them. Apart from the desecration of the beautiful countryside that Surrey is famous for, the road system around here of narrow lanes (incidently still full of potholes) simply cannot cope with the increase in traffic that further large scale development will bring. Developers are allowed to build, take their large profits and leave the Council to sort out the resulting infrastructure mess - which the Council never does.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/1676  **Respondent:** 15344609 / Bernard Etheridge  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy A21

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Regarding the Aldershot Road Allotments I became aware of these allotments since early childhood in the 1940's, both my father and great uncle had plots on this site since early 1930's. The plot on which I currently work was taken over by myself in 1980 on the demise of my father, who won several "The Sturgess" cup for the best allotment in the "Stoke and District Allotment Society as it was in those days.

I believe that these allotments must be retained for the enjoyment of like gardeners both for recreation an maintaining good health, giving a healthy body and mind, by exercise and healthy eating fresh produce, not forgetting growing some floral decoration for the home, and friendships gained.

Having a double heart by-pass and valve replacement a short while ago the exercise and being out in the fresh air, considerably helped regaining my fitness over a period of some months. More recently I conracted Pneumonia and was hospitalised for 7-8 days in working the plot helped with my now full recovery, and at 80+ this was not an easy task.

Further regarding the lower access gates these are wholly necessary for ease of access,[ bearing in mind the access need for the local schools activities in being made aware of the relative need for growing food and where it comes from etc] deliveries of "fertiliser products" and other needs. The slope between the upper gate and the lower gate, whilst it appears safe in the summer months, is totally different in the winter, since it becomes slippery and extremely dangerous, both on foot and vehicular.
When the area of ground, probably Plot was taken, early 1960's by Puttocks Garage, it was agreed a certain number of spaces were to be allocated to allotment holders in recognition of this, under the then new retaining wall. Prior to that, I well remember farmer 'Baldrey' having the area.

I was born in Hillcrest Road and lived until marriage in Guildford, I spent my early working life, in and around Wood Street [Drummond Bros] and nearby Normandy [Vokes Ltd], although now living in Fleet have a high interest in these allotments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1677  Respondent: 15344641 / Ann Court  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the building of 45 houses at Clockbarn Nursery.
   Tannery Lane has as exceptionally narrow and winding road, in places only room for one car and if you meet a lorry there is no room for manoeuvre.
   Also a very hazardous junction coming from Tannery lane to join the Send Road, the sight vision is dreadful with parked cars either side of the junction onto the main road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1678  Respondent: 15344641 / Ann Court  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the building of 400 houses and an Industrial space at Garlick Arch.

This site in particular is covered with woodland and pasture and certainly never intended for building purposes.

The site floods dreadfully, water coming off the A 3 into the stream which then floods the fields.

We have photographic proof of this as it is Cobham Sporting Gun Club site and has been for the best part of 30 years and floods often.

The Industrial proposal should be sited at Slyfield which would be ideal to extend and keep in one place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1680  Respondent: 15344641 / Ann Court  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

5 I object to a new interchange with the A3 at Burnt Common very strongly.

The traffic now if there is a problem on the M25 or A3 is horrendous through the villages of Ripley, Send Marsh and Send and we become grid locked with traffic

finding alternative routes out of the congestion.

The roads are not capable of taking on all the extra volume of large lorries which is what would happen.

We had to have an Air Ambulance land on Send Marsh Green last week for an accident and part opf our road was closed diverting bus and large vehicles around the Green

causing havoc, we cannot support all this extra traffic, its spoiling our lovely English Villages here in Surrey.

Lets not ruin our lovely countryside when there are a lot of Brown Sites to consider first... WE DONT WANT TO BE JOINED TO GUILDFORD , WOKING etc.

What consideration has been taken for Drs, Schools, Colleges, Transport Leisure etc.?

All these things require a car, bus, train, coach which again add to the volume of traffic at rush hours.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1679  Respondent: 15344641 / Ann Court  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44
4 I object to the development of 40 houses and 2 pitches on Send Hill called the Paddocks.

Again access to this site is very narrow especially from the Cemetery down to Potters Lane where that junction is often a cause for concern the way the traffic speeds along Potters Lane and again an inappropriate place for houses and travellers site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Re LOCAL PLANNING:

1. I object to Send Village being removed from the Green Belt

As I understand the Green Belt was always intended to be kept as such to provide a division between Villages, towns etc

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Transport

As it is now, there are insufficient parking spaces at both Horsley and Effingham stations. If you arrive after 09:00 and need to go to a meeting in London then there is nowhere left to park your car and all of the local roads nearby have parking restrictions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/3679  Respondent:  15344737 / Alex Bell  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Green Belt

Given that West Horsley is a rural village and given that Green Belt land is supposed to be protected, what possible justification can there be for removing West Horsley from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3677  Respondent:  15344737 / Alex Bell  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Please take the below as my feedback, as a West Horsley resident, on the Draft Local Plan.

Excessive new housing in West Horsley

The proposal for 385 new houses in West Horsley is completely excessive and way out of line with all other Guildford Villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<tr>
<th>Comment ID: PSLPP16/12004</th>
<th>Respondent: 15344929 / Leon Sunkin</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to the remove green belt protection from our village.</td>
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<td>I wish to object to the above plans.</td>
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<th>Comment ID: PSLPA16/1069</th>
<th>Respondent: 15345025 / John Weaver</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>To sum up, the proposal to build over 533 homes at a density significantly above that currently in the Horsleys on green belt sites would permanently destroy the character and appeal of the village and place an intolerable strain on local roads, the Raleigh school, the medical centre, and access to local shops and services. It also completely ignores the views expressed by the local population in the West Horsley Neighbourhood Plan survey in 2014.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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The Raleigh school is the only state primary school that serves both East and West Horsley and it is full and over subscribed every year. So, where are the increasing number of young children going to attend school or do you expect the school to absorb the extra pupils in much larger class sizes or portocabins?

I serve on the committee of the Kingston Avenue Medical Centre Patient Participation Group which is the only NHS GP surgery that serves both villages. It is currently working above capacity, is finding it difficult to recruit and retain Doctors, and could not absorb the population increase from the proposed developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

There are also other facilities and services that just could not cope with the increase in population and traffic. Horsley railway station car park and bicycle bay is full every week day and there is limited parking for the village shops, library, bank, and restaurants. Traffic congestion, parking queues, and frustrated drivers will be the inevitable result with all the attendant safety concerns. There is also a capacity problem with the village waste water system which periodically overflows flooding local roads. Thames Water has already advised you that the system will be unable to support the additional demand, but no mention in the plan for upgrading it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/3685  Respondent: 15345025 / John Weaver  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have lived in West Horsley for 30 years and strongly object to the proposals put forward in the latest Guildford local plan
to strip the Horsleys of green belt status and to build 533 high density dwellings. If these proposals go through you will be
responsible for significantly and irrevocably destroying the character and appeal of one of Surreys most beautiful villages
and declaring open season for further development . The Horsleys were granted Green Belt status to prevent precisely what
you are proposing, to ensure that land is not over developed and that green open spaces are provided for people to enjoy.
Whilst I understand the need to build more homes we should not be doing it at the expense of villages which add so much
to the character, appeal and beauty of the county. The Borough is proud to boast that one of the things which make
Guildford great is that 89% of the Borough is Green Belt, so why are you proposing to reduce it ? Your proposal in fact
does not provide a solid case for removing our green belt status and increasing the West Horsley housing stock by a
staggering 35%, greater than any other single area in the Borough. There is certainly no mention of this in the 'Guildford
Borough Economic Strategy 2013 - 2031' document, so what has changed ? I also have not seen proposals to address the
drastic effect that the addition of 533 houses will have on local roads, infrastructure, and services, and your proposal to
build an additional 2500 homes in the immediate vicinity will make this even worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3691  Respondent: 15345121 / John Fowler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to the erosion of the green belt within the above plan. The Green Belt Act was brought in to ensure
that no further undeveloped land was built on around large suburban areas. This was to ensure that local residents continued
to have the opportunity to enjoy the countryside, by car, bicycle, horse or walking. Also to see and observe nature. I am
dismayed that the Guildford 2016 Plan proposes reducing the areas for countryside recreation and farming. With the
increased population in the area consideration should be given to increasing the green belt so that the density of people to
green belt is brought back to what it was when the green belt was first proposed. Again we need more farmland to feed the
population not less. Erosion of green belt also means more flooding as there is less land to adsorb the run off water.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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<td>In my opinion the plan does not have any regard for the current infrastructure within the area, which cannot cope with the current traffic conditions and the requirements of the current population, with the current facilities over stretched from schools to the local doctors surgeries. It is a plan that will profit a number of developers who have no regard for the area or the local population and this is wrong and immoral . I would therefore like this email to be logged as an objection to the proposed plan and await the acknowledgement for my records.</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I am writing to lodge a formal objection to the New Local plan 2016 as proposed. I have resided at [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] for over 8yrs with my children attending both the local authority schools within the area . My first objection is that the Horsley’s should remain in the green belt area, as this is an area of outstanding natural beauty. It is our duty that this is preserved for our children and future residence…once it is gone it can never be brought back and see this as an attack on the green belt and everything this policy stands for.</td>
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<th>Comment ID: PSLPA16/1072</th>
<th>Respondent: 15345281 / Alexandra Murphy</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick's Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1073  Respondent: 15345281 / Alexandra Murphy  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

   The "objectively assessed need" figure of 693 homes a year is too high.

   A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.

   The current SHMA inflates the proposed housing figure due to

   failure to correct for errors in the historical data for international migration flows,

   issues with the way it considers students and affordability and flaws in the method for estimating the number of homes needed to support job growth.

   It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.
The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1720  
Respondent: 15345281 / Alexandra Murphy  
Agent: 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8).

There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brownfield site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site.

There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.
Moreover, Guildford Borough Council's own Green Belt & Countryside Report does not address Garlick's Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy 13).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy 14)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy 11)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of 'through' traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3735  Respondent: 15345281 / Alexandra Murphy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick's Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3727  Respondent: 15345281 / Alexandra Murphy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1
If developed, the new employment site at Garlick's Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (Blc), general industrial (B2) and storage and distribution (BB) at Garlick's Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick's Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy ES supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick's Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3756  Respondent: 15345281 / Alexandra Murphy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT. Tourism and visitors do not depend on new visitor "attractions" and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for over development/"Disneyfication". Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many "leisure and visitor attractions" already. The case for creating more is not made and no examples are given. Instead, the plan's explicit priorities should be:

1. To protect the borough's prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
2. To help make Guildford's river landscape less off-putting and support town-break packages for high-value tourism. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in pri An "English town break" (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in
London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3753  Respondent: 15345281 / Alexandra Murphy  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT (POLICY H1 - Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan peri It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of "regulatory capture" by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY H3 - Rural Exception Homes

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the "mix" this can include "market" housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove "exceptional circumstances ."

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.
I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/3750  **Respondent:** 15345281 / Alexandra Murphy  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

   Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

   Despite the Garlick's Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents' in the locality will see their quality of life significantly deteriorate in many ways.
Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick's Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3751  Respondent: 15345281 / Alexandra Murphy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Paragraph 4.6.27 of the Plan states that "Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health." The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPP16/3722  **Respondent:** 15345281 / Alexandra Murphy  **Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick's Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a 'special circumstance' and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl land these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC's Green Belt & Countryside Report does not address Garlick's Arch, so there is no evidence base to support including this site.

Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPP16/3725  **Respondent:** 15345281 / Alexandra Murphy  **Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough's identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick's Arch (A43) is identified on the Environment Agency's flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council's SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding.

Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3716  Respondent: 15345281 / Alexandra Murphy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the Local Plan as the development proposed will not be sustainable {Policy s1h

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to
being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3712  Respondent: 15345281 / Alexandra Murphy  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to one specific aspect of the consultation process which is fatally flawed. The Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the green belt." This is demonstrably untrue and I believe it is deliberate untruth which compromises the consultation process. Even the council's position in the draft Plan is that exceptional circumstances exist so as to justify taking areas out of the Green Belt - which by definition has a detrimental impact on the Green Belt. This unqualified statement cannot be justified and is simply untrue. By giving this unqualified assurance to residents that there is no detriment to the Green Belt residents may have been reassured and dissuaded from responding to the consultation.

I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (We assume the document was delivered to most houses in the Borough.) I have no doubt that that people will argue before the inspector that the consultation process was flawed and ineffective because of this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3718  Respondent: 15345281 / Alexandra Murphy  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The Housing number is based on pre-Brexit data for economic and population growth, including these, now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the "West Surrey" tri-borough area of Guildford, Woking, and An HMA should be an area within which a majority of people live, work, shop, or study. On any common sense view, "West Surrey" is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East, and Basingstoke to the West, but all lie well outside "West Surrey". Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich, or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make "West Surrey" reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s "need". Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
As a resident of East Horsley since 1976 I feel I should make my objections known to the proposed building of 533 houses in East and West Horsley. Removing the Horsleys from the Green Belt will be detrimental to the environment, wildlife included and will alter and damage the landscape for no reason after having protected it for over 60 years. It will change forever the ethos of a village life with a community.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I have studied this subject in some detail and cannot understand why these ridiculous proposals have been put forward. This is not Nazi Germany or a Soviet Socialist Republic, and this is not a simple propaganda exercise. There is no need for you to copy the style of the Referendum debate with a load of unjustifiable facts figures and nonsense.

I demand the resignation of all those responsible for this stupid plan which was bound to result in hundreds of thousands of very reasonable objections.

The Green Belt is laid down in law, it has proved its worth, you have no right to meddle with it. I don’t believe your figures or the expert opinions you quote, other experts have different opinions.

In my objections I am not going into further detail, all the details have been covered by other objectors, but my husband (separately) and I simply object to the whole mess you have made of this job (and will be held responsible for) and we support the West Horsley Paris Council’s objections without exception and in their entirety.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLP16/1701  Respondent: 15345601 / Ray Salim  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Pollution: The large increase in volume of traffic will cause an increase in nitrogen dioxide and particulates in the environment – already a cause for concern in several areas in the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3734  Respondent: 15345601 / Ray Salim  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Schools: Local schools are already at capacity – where will newcomers go to school? No extra places are planned in the Horsleys, and the school places proposed at Wisley Airfield will not planned until many years into the project.

Medical facilities: Similar situation to the schools.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3732  Respondent: 15345601 / Ray Salim  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to raise my objections to the proposed local plans for housing development at Wisley Airfield and throughout the Horsley villages.

This is based on the following;

Traffic and parking:

Assuming that every new house has at least 2 cars, this means potentially 6,000 more cars within a three mile radius of the villages. The impact on local roads will be tremendous. Parking at Horsley & Effingham junction stations (which are already full), at the shops, at the medical centre and at the village hall will all be affected.

Local Road Network:

In respect of the proposals for development at Wisley Airfield and for an upgrade the current A3 junction at Burntcommon to a full 4-way junction, SCC traffic modelling anticipates increased use of Guileshall Lane, Hungry Hill Lane and Tithebarns Lane for traffic accessing the A3 at Burntcommon in order to travel to Guildford and beyond. The SCC report states that “consequently, it indicates that further thought may have to be given to managing traffic in this area as part of a transport assessment should the development be progressed”. It appears that the Plan is proposing a strategic site at Wisley Airfield without even knowing what improvements to the local road infrastructure will be required. If that is the case for Wisley Airfield, then it is almost inevitably true for the proposed developments in East and West Horsley as well.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3737  Respondent: 15345601 / Ray Salim  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Transport: Misery for commuters, nowhere to park and overcrowded trains at commuting times.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: PSLPP16/3736  Respondent: 15345601 / Ray Salim  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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**Loss of Green Belt land:** Sadiq Khan, new Mayor of London, has instructed London planners not to approve development on Green Belt Land within the M25. If we continue to build on our countryside it won’t be many decades before we have none left. Creeping development has led to almost continuous housing from Central London to Effingham. Is this to carry on to Guildford and beyond? (1,700 houses are planned for the Guildford end of the Hogs Back and 1,000 new houses on greenfield sites in Normandy.)

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: PSLPP16/3733  Respondent: 15345601 / Ray Salim  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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**Flooding:** The site behind Ockham Road North in East Horsley is partially a level 3 flood risk area, and local residents are well aware of how much standing water there is in their gardens after rain. Building on such land will only exacerbate the problem. We already know what happens to local roads when it rains – the drains can’t cope.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: PSLPS16/1704  Respondent: 15345665 / Paul Rijbroek  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A23
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the moving of the Urban Boundary to encompass the site for the new Burial Ground north of Salt Box road. As far as I understand, it is not necessary to change the Status of the Land from Green Belt to Urban for a Cemetery. It is lawful to place a Cemetery on Green Belt, therefore there is no need to go to the cost of altering the land’s status. If Green Belt status is moved to Urban status, then a change of plan for this ground is easily implemented, even though it is adjacent to a Triple SI site.

If I have misunderstood, please confirm back to me.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6545  Respondent: 15345665 / Paul Rijbroek  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A23

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to object, on behalf of the Whitmoor Common Association, to the moving of the Urban Boundary to encompass the site for the new Burial Ground north of Salt Box road. As far as I understand, it is not necessary to change the Status of the Land from Green Belt to Urban for a Cemetery. It is lawful to place a Cemetery on Green Belt, therefore there is no need to go to the cost of altering the land’s status. If Green Belt status is moved to Urban status, then a change of plan for this ground is easily implemented, even though it is adjacent to a Triple SI site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1705  Respondent: 15345697 / H Markham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID:</th>
<th>PSLPS16/1712</th>
<th>Respondent:</th>
<th>15345825 / Barry Weekley</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Ref; Policy A44 1.9.ha- Winds Ridge and Send Hill.

I am writing to express my concern over the development of 40 homes, and two travellers sites at Winds Ridge and Send Hill. I am utterly opposed to this proposal, which is not in the regulation 18 draft, and I find Potters Lane will not be enhanced in any way, by the extra traffic and inconvenience caused to this quiet lane.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have just received notice of a proposed development of 154 houses by Copperwood Developments on land adjacent to Ash train station. Recently I received notice of a proposed development of 115 houses by Persimmon on land off Foreman Road. These are in addition to 450 houses currently being built behind Ash Manor School off Manor Road.

If these proposals are passed that will be an extra 729 houses in Ash. That means over 2000 extra people including 700 to 800 children not to mention over 1500 extra cars!!
1. Where will the people go for their health care? It already takes over a week to get a routine appointment at Ash Vale Health Centre.
2. Where will all the extra children go to school? Several schools in Ash have been closed over the past years and the land sold, ironically, for housing!!
3. Where will all the extra cars go? Ash is already very busy with traffic, especially at commuter times. With an extra 1500 cars we can expect gridlock!! Car parking at the shopping areas in Ash is also beyond its capability. Further cars will make daytime parking in the village intolerable.

Additionally the two areas proposed are both to the south of the A325 Ash to Guildford Road which has been a natural southern boundary of the village and designated as land bordering the Green Belt. Where will development stop – when it reaches the Hogs Back road??

All this in addition to a proposed development of 1100 house a mile away in Normandy. I sincerely hope that all three proposed developments are turned down otherwise this currently rural area will become yet another urban jungle with an infrastructure that cannot cope.

These three new proposals for Ash & Normandy are ludicrous and must be rejected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

I object to the thought of 2,000 houses on the old Wisley airfield, a more realistic number should be considered but taking care of our country lanes should also be valued.

I object to the lack of real evidence for the supposed housing need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/1723</th>
<th>Respondent: 15346817 / Valerie Mead</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

I object to the A43 Garlicks Arch proposal. We bought our house in a Green Belt area because it WAS in a Green Belt area.

I object to the A43 Garlicks Arch proposal as additional housing would mean reliance on our local Surgery which is already pressurised.

I object to the Garlicks Arch proposal also as apart from additional traffic described above, additional housing would apply more pressure to local schools.

The well being of the local Villagers of Send and Ripley must be considered.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1722  Respondent: 15346817 / Valerie Mead  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the proposal on the following lines :-

The proposed Ramp at Burnt Common on to the A3 would increase the already high density traffic flow along the A247 from Burnt Common roundabout towards West Clandon and would cause more problems from noise and pollution for homes in the vicinity.

At the moment traffic speeds along the A247 making joining it for residents at peak times extremely difficult.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1725  Respondent: 15347233 / Lesley Kollinsky  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s draft Local Plan Proposals to build 1800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Far, which will:

• Destroy views from the Hog’s Back ridge0 a nationally designated Area of Outstanding Natural Beauty
• Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
• Increase tailbacks on the A31 and traffic congestion
• Result in rat-running through local roads
• Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/1726  Respondent: 15347297 / Margaret Carol Watts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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• Destroy views from the Hog’s Back ridge a nationally designated Area of Outstanding Natural Beauty
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• Increase tailbacks on the A31 and traffic congestion
• Result in rat-running through local roads
• Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1727  Respondent: 15347393 / Dawn Lisher  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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• Destroy views from the Hog’s Back ridge a nationally designated Area of Outstanding Natural Beauty
• Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
• Increase tailbacks on the A31 and traffic congestion
• Result in rat-running through local roads
• Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/908  Respondent: 15347393 / Dawn Lisher  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1730  Respondent: 15347457 / Roger Kent  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s draft Local Plan Proposals to build 1800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Far, which will:

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- Result in rat-running through local roads
- Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1731  Respondent: 15347489 / Nalini Kent  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
We object to Guildford Borough Council’s draft Local Plan Proposals to build 1800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Far, which will:

- Destroy views from the Hog’s Back ridge a nationally designated Area of Outstanding Natural Beauty
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- Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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- Increase tailbacks on the A31 and traffic congestion
- Result in rat-running through local roads
- Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1074  Respondent: 15347937 / Margaret Brazier  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Traffic in the village is appalling, delays and queuing is every day and when events are held at the local private school in Ockham Road North, East Lane (from which much of the proposed development is targeted) becomes a dangerous car park.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3770  Respondent: 15347937 / Margaret Brazier  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4. The plumbing and drainage systems cannot cope with heavy rainfall now. Water bubbles up and road flooding is rampant.

1. The Doctor’s surgery in east Horsley is over-stretched currently and patients have to wait weeks for an appointment. Even the emergency sessions are forced to limit the number of patients they can deal with.

6. The school is always full and there is no room for an extension to the building.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. I may be naive but I am not being disrespectful but I have always understood, and voted accordingly, that the local councillors are there to protect the interests of the ratepayers and if the answer is that this is a Government instruction, surely no Government Minister intends that a council should destroy an entire village to meet a doubtful planning target.

2. On the same theme, this plan will encourage more pollution in this area due to the massive influx of cars. The Government is supposed to be reducing pollution to protect public health.

10. The public is constantly inundated with the needs of OTHER people but what is happening to the needs of the West Horsley population? Do they deserve to have their whole standard of life as they know it destroyed and that of their families.

All these objections also apply to East Horsley and any possible development at the Wisley airport site. The majority of people in this area commute to London. More trains can possibly be laid on but where will the commuters’ cars park? Not in the railway station car parks. They are already full to capacity.

Finally if the plan goes ahead the developers will come, build their houses, walk away with enormous profits and the villagers will have to pick up the pieces.

Please reconsider this plan for all our sakes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I wish to OBJECT in the strongest possible terms to the above plan as it effects the Green Belt villages of East and particularly West Horsley. The proposal that would increase the size of West Horsley by something like a third – adding 385 dwellings – provides more problems than it offers solutions and poses a host of unanswered questions such as:

O The green belt can only be built on in exceptional circumstances and – regardless of the insetting smokescreen – what are the the exceptional circumstances for Guildford Borough Council’s decision to abandon the Belt and change the character of West Horsley for ever? Especially as there are exceptional reasons why the scale of the envisaged changes is completely and utterly unsupportable. Vital infrastructure such as medical services, education and retail outlets are already mostly unavailable for the current rate-paying population of the village. The residents have to share with neighbouring East Horsley for the still inadequate facilities provided there.

O A basic environmental requirement is adequate drainage. Thames water have advised in no uncertain terms that the current wastewater network for West Horsley is unlikely to support the anticipated demand from the number of planned extra dwellings. What is GBC proposing to do about it?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/3769 | Respondent: 15347937 / Margaret Brazier | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

3. West Horsley already cannot cope with its extremely poor road system- badly maintained with countless pot holes and rough surfaces.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/3993 | Respondent: 15347937 / Margaret Brazier | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
The current plan could increase the village population by something like 1,500 people and the number of cars by an extra 700 – 800. The totally neglected road network in the village is insufficient at present for the volume of traffic because The Street through the centre of the village is a convenient short cut for A246 traffic from the Guildford direction heading for the A3 and the M25. And there is no general public car park in West Horsley. What are the Council’s proposals for coping with this already acute problem?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

 Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/3766</th>
<th>Respondent: 15347937 / Margaret Brazier</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I am writing to OBJECT most strongly to the proposal to build 385 houses on West Horsley’s Green Belt. Nobody answers the question of who the dwellings are meant for and why West Horsley – out of all proportion to other areas in and around Guildford - has been selected as the victim to endure years of destruction of agricultural land, major equipment carving up the roads, noise and all to add to the already appalling lack of sufficient infrastructure in the village.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

 Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/3768</th>
<th>Respondent: 15347937 / Margaret Brazier</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

2. The destruction of the West Horsley Green.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

 Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/3767</th>
<th>Respondent: 15347937 / Margaret Brazier</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I base my objections on the following submissions:

1. The addition of 385 extra dwelling is out of all proportion to the size of the village, an increase of 35% in existing West Horsley households – greater than any other single are in the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID:</th>
<th>PSLPP16/3994</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

O But the big and unanswered question is who is expected to benefit from this plan? Surely not the suffering ratepayers already living in the village. Nor hardly the unsuspecting newcomers who will have to pay scandalous inflated prices for whatever dwellings eventually emerge (a development in West Horsley’s Weston Lee of “affordable” tiny semidetached bungalows originally for the elderly currently change hands at little short of half a million) I suspect that the only people rubbing their hands with glee will be greedy developers, joyful estate agents and of course the Council planners if they are able to report to Government Ministers that “we have met our new build housing targets – and Oh by the way in the process- despite tremendous opposition- we have been able to completely destroy yet another historic heritage village.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID:</th>
<th>PSLPA16/1075</th>
<th>Respondent:</th>
<th>15348033 / Peter Nicholas</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the proposed Infrastructure Schedule (Appendix C).

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough, it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1751  Respondent: 15348033 / Peter Nicholas  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the development of the Gosden Hill site as proposed in the Local Plan. The land in Gosden Hill does exactly what the Green Belt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the slip road to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land, all requirements of the NPPF.

The scale of Gosden Hill is out of proportion with West Clandon. It would have four times the amount of housing plus shops, offices, factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is already stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.
If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1753  Respondent: 15348033 / Peter Nicholas  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43).

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan, it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states a preference is for making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced by a greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).
The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at such a late stage, no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1754  Respondent: 15348033 / Peter Nicholas  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)  

The additional north facing ramps to the A3 at Burnt Common would be very detrimental for local communities as it would draw in a huge amount of through traffic. The route from London/M25 to Woking or would become through Burnt Common and Send. Equally, traffic from the east of Guildford (Merrow etc.) and the A25 would increasingly go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3787  Respondent: 15348033 / Peter Nicholas  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3).

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/3784  **Respondent:** 15348033 / Peter Nicholas  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the sustainable employment policy (Policy E1).

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/3785  **Respondent:** 15348033 / Peter Nicholas  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the location for new employment floor space at Garlick’s Arch – Site A43 (Policy E2).

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floor space will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floor space to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to the loss of rural employment (Policy E5).

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them wants to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism does not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London. Activities most attractive to visitors, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3791  Respondent: 15348033 / Peter Nicholas  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy H1.

I OBJECT. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to the dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Surrey University could provide accommodation for a far greater proportion of its students on its campus if it made more efficient use of its existing site, which would free up dwellings in the town for local people.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/3792  **Respondent:** 15348033 / Peter Nicholas  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

**POLICY H3 – Rural Exception Homes**

I OBJECT. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/3788  **Respondent:** 15348033 / Peter Nicholas  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1).

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.
With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time; particularly at weekends, hundreds of cyclists pass through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments, there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk of injury to the public. In the case of West Clandon, the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

1. I OBJECT to the lack of proper infrastructure planning for sites (Policy I1).

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further.

There is no provision for increased capacity of Guildford hospital.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2).

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situation worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3790  Respondent: 15348033 / Peter Nicholas  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT due to poor air quality concerns (Policy I3).

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on the health of local residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3782  Respondent: 15348033 / Peter Nicholas  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to not protecting the Green Belt (Policy P2).

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional
circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
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<th>Comment ID: PSLPP16/3783</th>
<th>Respondent: 15348033 / Peter Nicholas</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

I OBJECT to development in areas which are at risk of flooding (Policy P4).

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well, I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
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<th>Comment ID: PSLPP16/3780</th>
<th>Respondent: 15348033 / Peter Nicholas</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
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I wish to object to a number of aspects of the proposed Guildford Borough Local Plan, and set out below my specific comments;

1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1).

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities through over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities. In particular the existing road network will not be able to cope with the increased traffic that would be generated by the proposed development.

As a resident of West Clandon, I have particular concern about safety issues in the village. As you are aware, the main road through the village, being an A road already carries a great deal of through traffic and there seems to be no alternative to this. At various points, the road narrows so as to be only just wide enough for two cars to safely pass and not wide enough for a lorry (of which many pass through the village) and a car, let alone two lorries. As a result, lorries frequently mount the pavement. There is generally only a pavement on one side of the road, necessitating pedestrians to cross the road in a number of places. The traffic that would be generated by the proposed developments of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill will create traffic chaos in the village and undermine the safety of pedestrians and cyclists.

The balance of residential development between existing urban areas and Green Belt land is wrong. The policy of further retail development in Guildford centre is clearly misguided as retail sales steadily shift online. The North Street regeneration project has been proposed for many years already and has never happened. Why not? I think it is highly doubtful that the retail development proposed in the Plan can be financed and the project will languish for many more years. Meanwhile, there is demand for housing in the Borough and town centre residential locations are popular with the young and the old alike. If the proposed retail development in Guildford centre were curtailed, a few thousand more dwellings, a significant proportion of the number seen as needed in the Plan, could be built.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3781  Respondent: 15348033 / Peter Nicholas  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
I OBJECT to the Borough Wide Strategy (Policy S2).

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

2. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation of Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D).

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to failure to correct for errors in the historical data for international migration flows,
- issues with the way it considers students and affordability and
- flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the figure of 322 used in previous plans. The SHMA report methodology is, I believe, inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1752  Respondent: 15348065 / Lorraine Gould  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- Destroy views from the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of scenic farmland and additional woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat running through local roads
- Add to Guildford’s pollution.
I object to removing the Horsleys from the green belt.

I object to the building of 533 new houses in the Horsleys. I also object to development of the Wisley Airfield. The developments would create too much traffic on already congested roads. The medical facilities in the area are already stretched. There would not be enough car parking spaces in the shops or station. Drainage in the area is already inadequate and there will be much higher levels of pollution. The schools in the area are already full, please do not destroy our beautiful countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to removing the Horsleys from the green belt.

I object to the building of 533 new houses in the Horsleys. I also object to development of the Wisley Airfield. The developments would create too much traffic on already congested roads. The medical facilities in the area are already stretched. There would not be enough car parking spaces in the shops or station. Drainage in the area is already inadequate and there will be much higher levels of pollution. The schools in the area are already full, please do not destroy our beautiful countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

We object to Guildford Borough Council’s draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- Destroy views from the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of scenic farmland and additional woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat running through local roads
- Add to Guildford’s pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
We object to Guildford Borough Council’s draft Local Plan proposals to build 1800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- Destroy views from the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat-running through local roads
- Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I wish to protest very strongly against the proposed level of new housing for Guildford. In particular,

**Town character:** expansion should be constrained to protect the character of town and country in our already extremely congested historic market town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/3801  Respondent: 15348321 / Vivien Sale  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Infrastructure: There are extremely significant infrastructure constraints that need to be addressed in advance of any expansion, and not afterwards.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3800  Respondent: 15348321 / Vivien Sale  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Traffic problems: Getting into Guildford during busy times takes ages. The town centre is often gridlocked as it is. Parking can be a nightmare.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3802  Respondent: 15348321 / Vivien Sale  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

**Transport:** There is already insufficient road and rail capacity for Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3804  **Respondent:** 15348321 / Vivien Sale  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In addition to this I belong to The Tyting Society, which has a particular interest in preserving the local AONB (area of outstanding natural beauty) for future generations, with single track lanes which cannot cope with additional traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3799  **Respondent:** 15348321 / Vivien Sale  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Green Belt:** the green belt should be protected for future generations. Once built on, it is gone forever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly believe that Guildford must constrain its overall housing growth.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1768  Respondent: 15348385 / Gemma Green  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to Guildford Borough Council's draft to build 1,800 house, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm.

It will destroy the beautiful views, remove scenic farm land and increase tailbacks on the A31. Plus increase pollution due to increased traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1770  Respondent: 15348417 / Carol Gaunt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- Destroy views from the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of scenic farmland and additional woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat running through local roads
- Add to Guildford’s pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1083  Respondent: 15348481 / Donna Styles  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

11. I OBJECT TO – the lack of any immediate provision for new schools.

12. I OBJECT TO – the lack of immediate provision for Doctors Surgeries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1780  Respondent: 15348481 / Donna Styles  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

5. I OBJECT TO – Gosden Hill Farm Site A25. Overdevelopment in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1781  Respondent: 15348481 / Donna Styles  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

6. I OBJECT TO – to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt – Site A35.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1777  Respondent: 15348481 / Donna Styles  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT TO – the late addition of Garlicks Arch Site A43. The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick’s Arch.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1778  Respondent: 15348481 / Donna Styles  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3. I OBJECT TO – the On and Off ramp at Burnt Common/Clandon Site A43a – this will only add to existing traffic problems in the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4. I OBJECT TO – The Talbot Site A45. Overdevelopment in a conservation area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

7. I OBJECT TO – The Paddocks Site A57 – 4 traveller pitches.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

8. I OBJECT TO – the removal of any Villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Comment ID: PSLPP16/3824</th>
<th>Respondent: 15348481 / Donna Styles</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.  I OBJECT TO – the local plan as the proposed development is not sustainable (Policy S1).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/3826</th>
<th>Respondent: 15348481 / Donna Styles</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

9.  I OBJECT TO – the disproportionate amount of development in one area of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/727</th>
<th>Respondent: 15348481 / Donna Styles</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
10. I OBJECT TO – the lack of evidence for the alleged housing need numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp173/562  Respondent: 15348481 / Donna Styles  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object removing Send Business Park from the Green Belt (4.3.15).

Send Business park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for it’s insetting (removal) from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/3998  Respondent: 15348481 / Donna Styles  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the increase in housing proposed in Tannery Lane (site A42)

This has been increased by a third since the 2016 version of the Plan. This will have a significant impact on the already highly congested local rural road network around Send. This is in contradiction to section 2.14a of the Plan which states "Whilst most local roads are single carriageway, with a lane in each direction, it is at their junctions that the free flow of traffic is most often impeded during peak periods, in some cases resulting in significant delays.” And yet there is no proposals to improve the local roads, only to add more junctions with the A3, thereby increasing congestion on the Trunk and Local road network.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
| Comment ID: pslp172/3993  Respondent: 15348481 / Donna Styles  Agent: |
|---|---|
| Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
| I object to the allocation of 6 Traveling Showpeople sites in A34 Garlick’s Arch |
| The inclusion of 6 Travelling Showpeople plots with associated storage facilities is entirely inappropriate in a rural environment within the Green Belt and there is no identified need within the Local Plan. There is no proven demand for Travelling Showpeople plots in this location |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |

| Comment ID: pslp172/3997  Respondent: 15348481 / Donna Styles  Agent: |
|---|---|
| Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
| I object to the proposal for a Waste Management Facility in Green Belt (A58) |
| The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned, obscurely in policy 4.423a, and does not allow for full and proper consultation. These facilities are always highly contentious and the Council has a duty of transparency in this regard which it is, at best, neglecting. |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |

| Comment ID: pslp171/2077  Respondent: 15348481 / Donna Styles  Agent: |
|---|---|
| Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”.

The 2017 version says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.”

So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.

Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses]. That has now been removed, thereby accepting that needing to make greater than normal profit is to be an acceptable reason not to deliver affordable homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2075  Respondent: 15348481 / Donna Styles  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the extended development in the Green Belt (Policy P2, Site A43)

I object to Garlick’s Arch (A43) being extended and the resulting urban sprawl. There are no exceptional circumstances for this site being removed from the Green Belt, as required by the National Planning Policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/386  Respondent: 15348481 / Donna Styles  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the lack of proper infrastructure planning for sites (A43 and A42)

The Foreword to the plan by Paul Spooner includes on page 5:

"We recognise that significant infrastructure upgrades are required to support existing communities and the planned growth of the borough. The delivery of sites allocated in this plan is contingent upon the provision of new infrastructure, which is a key theme of our Local Plan."

The lack of any plan for either physical or green infrastructure improvement clearly contradicts this in respect of both A43 Garlicks Arch and A42 Clockbarn Nursery, Tannery Lane, Send. Development of these sites without the contingent infrastructure would therefore be contrary to the stated aims and themes of the Plan, and should not go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/2968  Respondent: 15348513 / Daniel Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A39

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

On Policy A39 arbitrary wording has been added to include self-building or custom building plots within the allocation of 100 dwellings in order to make the policy compliant with national legislation as opposed to what is appropriate for the site. The allocation of 100 dwellings on site contravenes Policy ID4 which inter alia states that: "Ensure appropriate density to make the most efficient use of the land whilst responding to local character and context". 100 houses on a 5.7ha site does not respond to local character and context given the nature of the immediately surrounding houses and the general established density of development in the village of East Horsley. The inclusion of self-build or custom build plots will not enable this density to be achieved as these type of developments will require a greater plot size to make them viable. I therefore object to the inclusion of Policy site A39 as a site for 100 homes as this is not a site that is capable of sustaining this number of dwellings if the principles of Policy ID4 are to be observed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1347  Respondent: 15348513 / Daniel Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
On infrastructure, the revised plan proposals do not address the additional strain on despite the overwhelming objections on subject in response to the previous consultation.

In particular the wording of Policy ID1 has been amended to give the impression that provision of adequate infrastructure will be enforced. However, this is not within the gift of GBC, but, in the case of the road network, by Surrey Highways and Highways England both of whom will be influenced by budgetary constraints elsewhere within their jurisdiction. Equally traffic Impact assessments will be prepared, and paid for, by applicants and not by GBC and will therefore present a biased outcome in support of any development.

I object to the inclusion of all sites other than brownfield sites on the basis that that GBC will be unable to secure or enforce the provision of the requisite infrastructure provisions either by negotiation with developers or through other government agencies. Any development must be in current urban or brownfield site areas where there is already an appropriate infrastructure provision.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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No consideration has been made in the revised proposals for the principle enshrined within the NPPF that exceptional circumstances must be demonstrated in order to develop within the Greenbelt. The proposal to inset the village of East Horsley has not been justified by exceptional circumstances. No account appears to have been made in the revised plan to the overwhelming body of public opinion that objects to the development of the greenbelt and which advocates the development of brownfield sites as priority. I object to the development of new accommodation on Greenbelt and to the proposal to inset the village of East Horsley and others.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I am writing to voice my objections to the draft local plan for the site in Normandy. I am retired and I therefore do not have to travel at peak times but the traffic on our local route and make getting around our local area extremely difficult. Today for example we had rain causing the drain at the top of Wanborough Hill to overflow this had the effect of nose to tail traffic tailing back on Westwood Lane, with the new development in place the numbers of cars on our lanes will be greatly increased.

I further object on the grounds that we do not require another school in this area as we already have schools which are accessible to the pupils in this area with capacity to accept them. If this school is built for the complete school curriculum years these pupils will need to come from outside the Normandy area putting very high stresses on the transport and road system.

I also would draw your attention to the wildlife that is currently residing alongside the occupants of Normandy, doubling the size of our village will lead to the decline of any wildlife in the immediate area. We are also adjacent to the Thames basin and although this is a conservation area this vast influx of people will have a detrimental affect a on the environment.

I object as also there are no provisions to increase the capacity of either our doctors or the local hospital and this will have very serious consequences on our health provision.

Our roads or paths cannot cope now and with no assisted road crossings on any of the raids will result in a tragedy.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/1784  **Respondent:** 15348641 / Clare Bennett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Whilst I support the concept of using the Wisley Airfield Site for development I am not convinced that such a large settlement is warranted.

It is a major anxiety that the development will impact on local roads which are already extremely busy.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I am sure there will be accusations of Nimbyism but I entirely support new development and provision of homes for younger families to bring fresh blood to our community.

However, this should take into account the size and nature of the current villages. One would hope that the new local plan would seek to enhance, not ruin the local environment.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

| Comment ID: | PSLPP16/3830 | Respondent: | 15348641 / Clare Bennett | Agent: |
|-------------|--------------|-------------|--------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1 |
| Do you consider this section of the document; complies with the Duty to Cooperate? | ( ) |
| Is Sound? | ( ) |
| Is Legally Compliant? | ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): | ( ) |

The proposed 35% increase in Horsley households as the result of the proposed 533 houses (plus smaller developments) seems completely disproportionate and cannot fail to impact on our already overstretched medical facilities, schools and roads.

Public parking in the small commercial areas for shopping etc. is already very tight and the increase in household numbers would result in extreme under provision.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

| Comment ID: | PSLPP16/3829 | Respondent: | 15348641 / Clare Bennett | Agent: |
|-------------|--------------|-------------|--------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? | ( ) |
| Is Sound? | ( ) |
| Is Legally Compliant? | ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): | ( ) |
I wish to register my concerns with regard to the Guildford Local Plan, open to consultation until July 18th 2016.

I object to the removal of the Horsleys from the Green Belt. There does not appear to be any ‘exceptional’ justification to do so.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1786  Respondent: 15348705 / Richard Shaw  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The draft Local Plan also proposes development of 2000 houses at the Wisley Airfield. This would be an unsustainable development that would depend heavily on private car transport, exacerbate safety concerns and congestion on the A3/M25 interchange and add significantly to the problems described above in the Horsleys.

This is an ill-considered Plan that should not be approved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1785  Respondent: 15348705 / Richard Shaw  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A36

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Thatcher's Hotel site is situated on a double-bend in the A246 adjacent to the B2039 that leads towards East Horsley village. It is already a dangerous and congested location, and the proposed development would increase these problems.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3834  Respondent: 15348705 / Richard Shaw  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
The impact of the proposed development would have a hugely adverse impact on the quality of the environment in the two villages, radically altering their character. The proposals would effectively turn the two villages into a new town midway between the existing settlements of Guildford and Leatherhead, eroding the open spaces that are such an important feature in the identity of the Horsleys.

The proposals take no account of the inability of local infrastructure to cope with such a large scale of development. Already the roads through the villages carry much more traffic than they were designed for and are bedevilled by inappropriate commuter traffic and lorry use. The local surgery and schools are oversubscribed, and the Horsley station car park has no spare capacity. Parking in East Horsley village is also under pressure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3833  Respondent: 15348705 / Richard Shaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

The draft Local Plan proposes to remove significant parts of the villages from the Green Belt. Deletion of the Green Belt requires exceptional circumstances to be demonstrated. They have not been demonstrated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I write to object to the new Local Plan that was published for consultation by Guildford Borough Council on 6 June 2016.

The Plan proposes a large number of houses for six development sites in East and West Horsley. I find no justification for this scale of development, which far exceeds local need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1787  Respondent: 15348769 / Irena Padol  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1794  Respondent: 15348833 / Barry Winser  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) -

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft local Plan for the following key reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3. I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4. I object to the disproportionate allocation of housing in this particular part of the Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5. I object to the threat the local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6. I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

   a. The assertion that the development will result in a meaningful shift to cycling and the development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars

   b. The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads

   c. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements

   d. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
e. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

f. The lack of suitable public transport The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

1. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

2. I object to the fact that air quality concerns have not been taken seriously- air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU permitted Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

3. I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.

4. I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) where the planning application has already been unanimously rejected by GBC’s Planning and Environmental Officers.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

**What changes (2016)/Further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/3858  **Respondent:** 15348929 / Rosemary Poile  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**
I strongly object to GBC’s proposal to remove Green Belt Protection from a number of villages including Chilworth. We need to protect against development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This e-mail is to express my extreme reservations and my formal objection in relation to your proposals to build additional houses in The Horsleys.

My principle objections are that you have not fully considered the impact the additional houses will have on the community and local infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/3874</th>
<th>Respondent: 15349217 / Philip Cole</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3. West Horsley, and indeed by its proximity East Horsley too, would be swamped with new housing, destroying the character of the villages. The National Planning Policy Framework requires that new residential development must respect the character and density of housing in the area and be limited in quantity by the availability of infrastructure and local facilities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<table>
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<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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4. The existing infrastructure in terms of roads, drainage, schools, and medical services, cannot sustain the additional need arising from such extensive housing. The roads around the village are already very busy and the car park at Horsley station is invariably full during the week. There are known sewage overflow problems in the Ockham Road North and Green lane areas. The Raleigh primary school, serving both East and West Horsley, is full every year, and the Howard of Effingham, the only secondary school with reasonable distance is oversubscribed every year. Kingston Avenue Medical Centre, which serves both Horsley villages, is struggling to cope with existing demand.

I should be grateful if you would take my views into account in this matter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/3872  Respondent: 15349217 / Philip Cole  Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

I am writing to object most strongly to the proposal to build a disproportionate number of new houses on a minimum of six larger plots, and a number of smaller ones, of green belt land, in East and West Horsley villages. My reasons are as follows:

1. The Green Belt and the Countryside police states that the green Belt will be protected against inappropriate development, and Guildford BC has not stated the exceptional circumstances or other justification for moving the green belt boundaries as proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/3873  Respondent: 15349217 / Philip Cole  Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
2. The development of up to 385 homes on the 4 proposed sites in West Horsley (Policy A37, A38, A40, & A41) are at much higher densities than exist in the village settlement and would be totally out of character with the existing mix of different housing styles and layout of the village. The proposed increase of up to 385 homes represents an increase of 35% of the current number of homes which is excessive in the light of the infrastructure capability – see point 4 below.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/602  Respondent: 15349217 / Philip Cole  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

Nothing has been put forward since last year's Consultation to improve the sustainability of the West Horsley development sites and thus meet national policy requirements. Every home on the West Horsley sites will need a minimum of one car to enable residents to get to shops, the medical centre, library, and Horsley Station, regardless of how much pressure is applied to adopt cycling and walking as the preferred means of travel.

I object to no changes being proposed since the 2016 consultation to removing East & West Horsley from the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2282  Respondent: 15349217 / Philip Cole  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I am writing to express my objections to the 2017 changes to the Local Plan.

The reduction in the number of new homes proposed in the Green Belt does not go far enough in reducing the still substantial number of new homes proposed on green belt land.

The eastern side of the borough is now scheduled to take an even greater proportion of new homes in the Green Belt.

It is unacceptable that Guildford is choosing not to constrain its overall housing growth, as many other Councils have done, to protect Green Belt. The objectively assessed housing target, though reduced since 2016 to 12466 homes, will by 2034 mean that Guildford will have grown by nearly 25%. This is nearly double the ONS’ prediction for the growth of Guildford.
I write to OBJECT to Amended planning application 15/P/00012 for the following reasons:

**Sustainability:** The site is remote and occupants will rely on the use of the private motor car adding to traffic congestion on both the Strategic Route Network (the A3 and the M25) and local roads which are already running over capacity.
- The application relies on people switching to walking, cycling and public transport. This is unrealistic as it is two miles to the nearest railway station and at least half the route has no footpath. Roads are narrow and unlit.
- There is no spare parking capacity at either of the local stations.
- Sites of this size are required to provide outdoor open space. The applicant has “double counted” the outdoor space with that required for SANGS
- The loss of high quality agricultural land is in contravention of policy.

**Air quality:** The air quality figures are based on an unreliable transport assessment.
- The applicant has not used the DEFRA modelling statistics as required and rather appears used numbers from an unrecognised (and unreliable source)
- Poor air quality is exacerbated in the area by temperature inversions which trap the air. Young and old are extremely susceptible to poor air quality.
- Air quality is not improving as fast as expected, partly due to the excessive emissions (VW et al)
- The impact of poor air quality on RHS Gardens at Wisley and the Thames Basin Heath Special Protection Area (SPA) is already in excess of legal limits.

**Transport:** The transport assessment makes a number of erroneous assumptions and is not credible.
- It is completely unrealistic to assume that there will be a decrease in vehicle movements.
- There is no impact on traffic for the recently added secondary school, nor from the fact that prior to the school being built the children will have to be transported to the nearest available school in Leatherhead – adding to congestion.
- There appears to be no impact shown for the 270 daily bus movements or for the waste lorries or HGV deliveries to the site.
- The TRICS data used for comparison is not a relevant measure: site not comparable with a site in Guildford, nor a site 400m from the centre of Redhill, nor one on the edge of Staines.
- The traffic counts bear no relation whatsoever with counts submitted to Guildford or to Woking borough councils in support of other large development projects.
- The modelling in the Transport Assessment at 7 junctions close to the site bear no relationship to the daily experience of residents, evidencing flawed modelling.
- The number of daily trips is understated in the region of 1000 vehicle movements.
- Additional traffic will have a negative impact and cause irreparable damage to historic houses and other buildings in Ockham/ Ripley/Downside and further afield.
- If allowed, the impact of the additional traffic may prohibit other developments further south on the A3 or indeed those needed by the RHS.

**Appropriate development**: The site is in the Green Belt in a rural location, hemmed in by the A3 to the west, the TBHSPA and the M25 to the north and the Conservation area of Ockham Village to the south.
- Green Belt boundaries can only be changed in the local plan process and in exceptional circumstances which have not been demonstrated.
- The site is not big enough to provide satisfactory living standards even for “affordable housing”.
- Four and five storey buildings are not appropriate in the rural environment nor on an elevated site.
- Residents will be crammed in with little outdoor space, a noisy location, with very poor air quality. The density of housing proposed is similar to that in Islington.
- The site is clearly visible from the Surrey Hills AONB and as a result it will have a negative impact on views to and from the AONB.

**Thames Basin Heath SPA/SSSI/SNCI**: The impact of 2,068 houses on the environmentally sensitive TBHSPA cannot be mitigated. Damage will occur to the habitats of the protected and endangered rare species (including skylarks, nightjars and many others on the RSPB red list) in contravention of the EU Birds Directives and Habitats Regulations.
- The siting of the proposed Suitable Alternative Natural Green Space (SANG) adjacent to the SPA will only increase visitor numbers causing further damage.
- Part of the SANG is in a designated flood plain.
- Para 119 of the NPPF “presumption in favour of sustainable development” does not apply where development requires assessment under the Birds or Habitat Directives.
- It is impossible to state without doubt that the mitigation proposed will prevent damage to the SPA particularly in the light of inadequate traffic/air quality reports.
- There are likely to be over 700 dogs and 700 cats living on the proposed development. These will be a constant threat to ground nesting birds on the SPA and cannot be mitigated by one warden working a normal working day.

**Impact on the local area**: The additional 5,000 residents is the equivalent of almost doubling the population of East and West Horsley combined. This increase in local population will impact:
- Light pollution, noise, traffic and infrastructure which has been gravelly underestimated and proposed mitigation measures are totally inadequate.
- The cumulative development in the borough and in the neighbouring boroughs of Woking, Waverley and Elmbridge per the objections from both Elmbridge Borough Council and Woking BC

- The water table and flooding in the area. It appears that no impact assessment has been done relating to the loss of agricultural land which currently soaks up a significant volume of rainwater.

- Listed buildings adjacent to it such as Yarne, Bridge End House and Upton Farm

- Via closure of a number of local roads coupled with an increase in traffic will affect a large number of road users from Cranleigh to Cobham and everywhere in between

**Inaccuracy of the documentation**: There are factual errors in the documentation

- Highways England have recommended that the proposal cannot be determined due to the applicants failure to provide traffic data in the format required

- There are a number of misrepresentations in the paperwork e.g. nine stations within 5 miles – this is however “as the crow” flies – only Horsley and Effingham Junction are within 5 miles by usable road from the middle of the development

- The applicant’s description of the site as brownfield is a gross over-simplification. 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remaining runway, a habitat for rare flora and fauna, (14ha) has never had buildings. The remainder of the site (55%) is high quality agricultural land.

**Other**: This site is not deliverable within 5 years due to problems with sewerage and water capacity, outlined by Thames Water & the OCK DVOR air traffic control beacon which limits development until 2022

- No very special or exceptional circumstances exist
- Alternative sites exist

- The proposal includes the site SCC safeguarded for waste under the Surrey Waste Plan

- The site is not listed for development under the existing 2003 Local Plan

- There is not enough land to provide a sustainable community based on GBC’s own parameters

- There is no update at all to the Heritage study despite the significant Bronze Age haul found in Ockham village in May 2013 and the likelihood of further remains on the site.

I trust the Council will find this useful, in their deliberations.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/1087  **Respondent:** 15349281 / Steve Aptel  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**
1. I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3343  Respondent: 15349281 / Steve Aptel  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1088  Respondent: 15349281 / Steve Aptel  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.
The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3344  Respondent: 15349281 / Steve Aptel  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1804  Respondent: 15349281 / Steve Aptel  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to Gosden Hill developement being in the Local Plan The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.
No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
1. I OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brownfield site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan. Please ensure that I receive written confirmation that you have received this correspondence by emailing me your acknowledgement.

Please also ensure that my objections are seen by the relevant Planning Inspector.

I have itemised my objections below but also wish to support some of my points by recalling personal experience and other observations (A-C)

1. **FLOODING**: The Garlick's Arch area is a catchment area for The East Clandon. This stream poses a significant flood risk to parts of Send Marsh, especially when there is heavy rainfall in a short time period. Any development of the Garlick's Arch area will significantly increase the rate of "run off" and this is likely to overwhelm the capacity of the stream through Send Marsh.

2. **Increased traffic congestion**: Traffic levels in the area are already high. The road infrastructure cannot cope with more. This is highlighted when there is a problem on the A3 or M25. Traffic diverts through the Ripley / Burnt Common area and there is gridlock.

I respectfully remind Guildford Borough Council that it has a duty of care to residents and this must be taken into consideration when evaluating the impact of traffic in the area.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

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Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1806  Respondent: 15349281 / Steve Aptel  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

1. I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition of north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6520  Respondent: 15349281 / Steve Aptel  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLP16/3885  Respondent: 15349281 / Steve Aptel  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

1. I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.
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1. **I OBJECT to the loss of rural employment (Policy E5)**

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.
Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1. POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in...
London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

I conclude by adding I realize I am lucky to live here and can see why many would want to do the same. But unrealistic and overly ambitious development destroys the very elements that make Clandon and neighbouring settlements special. Surrey has few real villages left so why not preserve rather than blight them?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13655  Respondent: 15349281 / Steve Aptel  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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1. I OBJECT to Gosden Hill development being in the Local Plan. The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF. The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond. Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel. The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools. Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day. Burpham's sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost. There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size. Electricity supply is also inadequate and would require a big infrastructure development. The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London. The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants. The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley. If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km. Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3. Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 15349281 / Steve Aptel</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H3 – Rural Exception Homes

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13654  Respondent: 15349281 / Steve Aptel  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

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Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3876  Respondent: 15349281 / Steve Aptel  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan. Please ensure that I receive written confirmation that you have received this correspondence by emailing me your acknowledgement.

Please also ensure that my objections are seen by the relevant Planning Inspector.

I have itemised my objections below but also wish to support some of my points by recalling personal experience and other observations (A-C)

A. FLOODING: The Garlick's Arch area is a catchment area for The East Clandon. This stream poses a significant flood risk to parts of Send Marsh, especially when there is heavy rainfall in a short time period. Any development of the Garlick's Arch area will significantly increase the rate of "run off" and this is likely to overwhelm the capacity of the stream though Send Marsh.

B. Increased traffic congestion. Traffic levels in the area are already high. The road infrastructure cannot cope with more. This is highlighted when there is a problem on the A3 or M25. Traffic diverts through the Ripley/ Burnt Common area and there is gridlock.

I respectfully remind Guildford Borough Council that it has a duty of care to residents and this must be taken into consideration when evaluating the impact of traffic in the area

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

1. I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3887  Respondent: 15349281 / Steve Aptel  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13651  Respondent: 15349281 / Steve Aptel  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

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Answer (if comment is on questions 1-7 of the questionnaire): ()

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1. I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/13640</th>
<th>Respondent: 15349281 / Steve Aptel</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/3880</th>
<th>Respondent: 15349281 / Steve Aptel</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. I believe this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3877  Respondent: 15349281 / Steve Aptel  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy. The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13635  Respondent: 15349281 / Steve Aptel  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3878  Respondent: 15349281 / Steve Aptel  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the Borough Wide Strategy (Policy S2)

a. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

b. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common-sense view, “West Surrey” is much too small.

c. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”.
Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13638  Respondent: 15349281 / Steve Aptel  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.
2. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.
3. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common-sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/95  Respondent: 15349281 / Steve Aptel  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/96  Respondent: 15349281 / Steve Aptel  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1090  Respondent: 15349281 / Steve Aptel  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Gosden Hill development being in the Local Plan. The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.
The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/197  Respondent: 15349281 / Steve Aptel  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/198  Respondent: 15349281 / Steve Aptel  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/199  Respondent: 15349281 / Steve Aptel  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/207  Respondent: 15349281 / Steve Aptel  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/201  Respondent: 15349281 / Steve Aptel  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

1. I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.
There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/204  Respondent: 15349281 / Steve Aptel  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/195  Respondent: 15349281 / Steve Aptel  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.
The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. I believe this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

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Comment ID: PSLPA16/1409  Respondent: 15349537 / Charles Lucas-Clements  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I understand that the Strategic Housing Market assessment done for this area is quite out of sync with the official estimate of population growth in the Borough, so one must ask, who gains from this proposal other than vested interests in the building trade and insiders to the process. In all we find these proposals to be wholly unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2550  Respondent: 15349537 / Charles Lucas-Clements  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In addition, we are highly surprised and shocked to find out that the Development of over 2000 houses on the Wisley Airfield and surrounding Green Belt areas is back on the plan, having been exhaustively studied and resoundingly rejected. The new plan has not addressed any of the concerns and has hardly changed. The area simply could not absorb this number of new houses and developments and is in between an already congested set of infrastructures would buckle under the strain. By this letter I add our names to object to this plan as well.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5641  Respondent: 15349537 / Charles Lucas-Clements  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The planned addition of over 500 houses (probably housing in the order of another 1500 to 2000 people) in the Horsley's would have huge negative impact on the local community and would overload the already stretched infrastructure with significant deficiencies in the potential provision of additional Healthcare and parking in either of the Railway Stations. There is little or no Public transport, so this does not provide alternates. Schooling in particular is already oversubscribed and adding up to 1000 more children to the area would be catastrophic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We have suffered from flooding in some areas surrounding Horsley, the run off from these additional housing would overload the drainage system and cause extensive flooding across roads and houses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3904  Respondent: 15349697 / Christine Hutchins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy II)

There is too much traffic in these villages already and this plan will cause more congestion in Chilworth and Shalford, with no plan to improve that.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to not protecting the Green Belt (Policy P2)

I object to removing Chilworth and Shalford from the Green Belt, and the resulting urban sprawl. I am a frequent visitor to this area and enjoy it's natural beauty.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Local Plan as the development proposed is not sustainable (Policy S1)

13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially the beautiful areas of Chilworth and Shalford. The local communities don’t need these houses. Chilworth and Shalford have inadequate bus and train services, so almost every adult will have to have a car.

The development should be in urban areas where there is sustainable transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the Local Plan as the development proposed is not sustainable

13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially the beautiful areas of Chilworth and Shalford. The local communities don’t need these houses. Chilworth and Shalford have inadequate bus and train services, so almost every adult will have to have a car.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
District Centre - GBC proposes that East Horsley is defined as a District. East Horsley is a rural village with character and open spaces in Green Belt and does not have space available for warehousing, offices and industrial sites. There are already a number of empty shop sites which do not attract businesses so there is obviously no demand for a "District Centre".

Conclusion - There has been little or no change from the ill-fated 2014 Plan. GBC continues to Plan to encroach on Green Belt land for which there are "no exceptional Circumstances". No justification has been given for the proposed enormous growth in Housing in the Borough.

I therefore object most strongly to the Proposed Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1810  Respondent: 15349761 / John Kettle  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. A development of this size at Wisley Airfield would have an enormous impact on neighbouring villages, including Ockham, Effingham and the Horsleys. The facilities in these villages will inevitably be swamped by such a large increase in population at the proposed site.

1. The road management plans for the Wisley site appear totally inadequate and unsafe. The traffic leaving/joining the A3 at the Ockham roundabout will create an extremely dangerous situation and we are sure that GBC and the developers would not wish to be responsible for the injuries and deaths that will undoubtedly follow from the development of this site.

1. Air quality has not been taken seriously and pollution in this area is in excess of EU permitted levels and will only get worse if this development proceeds.

For the reasons given above I object to this site being included in the Local Plan and request that it is removed forthwith.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5222  Respondent: 15349761 / John Kettle  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Infrastructure - There is little detail on the Infrastructure required to support the proposed housing development. There is already an overload on East Horsley facilities such as medical, schooling, parking and the narrow roads of this rural area. The usual suggestion is that the infrastructure will follow the developments but this is always years behind. The pressure on East Horsley from increased housing in East and West Horsley, as well as the prospect of a major (2000 homes) site at Wisley is frightening to those living in the Horsleys.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3913  Respondent: 15349761 / John Kettle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to object most strongly to this Plan to turn Wisley Airfield into a "new settlement of 2100 dwellings", for the following reasons:

1. This is Green Belt and there are no 'special circumstances' to be argued in favour of development.

   1. A development of this size, leading to urban sprawl, is totally inappropriate and not the solution to the provision of more housing, which should only be by small growth utilising brownfield sites where possible.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5220  Respondent: 15349761 / John Kettle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Green Belt

There is a government defined policy that Green Belt land can only be built on "in exceptional circumstances". Indeed the GBC Local Plan includes the statement "We will continue to protect the Green Belt". The Local Plan proposes extensive use of Green Belt land and makes no case for "exceptional circumstances". GBC is proposing new settlement boundaries for East Horsley encompassing Green Belt land so that new houses can be built in a re-defined village settlement. In addition GBC is proposing a new extended boundary described as "the identified boundary of the village". This is in an area currently protected by Green Belt. There are no "exceptional circumstances" defined for any of the re-drawing of the
settlement area. East Horsley is set in a rural location and the Green Belt has preserved the whole character and openness of this village. A recent East Horsley village survey indicated that 88% of the residents wished to see this maintained. GBC has proposed two sites for development in East Horsley (Thatchers 48 houses and Ockham Road North 100 houses). Both of these would be using Green Belt land, and in addition would be at a density quite out of keeping with the density of local housing. GBC has also stated that 3 further sites, identified as LAA sites, should be considered as potential development sites. These are again on Green Belt land. I should like to make the point that identifying these LAA sites is by no means easy as GBC does not include them in the Local Plan proposals and therefore the general public is not aware of these extra sites unless they know where to look. In my opinion this is a devious and disgraceful way for the Council to behave.

I object to any Housing development that makes use of Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1821   Respondent: 15350081 / Tania Parslow   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Secondly, I object to building 400 houses and 7000m² of industrial space at Garlick’s Arch opposite Send Marsh Road. This is in an area prone to flooding and has established woodland. More efficient use of brownfield sites within Guildford is vastly preferable to this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1823   Respondent: 15350081 / Tania Parslow   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Thirdly, I object to the new interchange at Burnt Common with the A3 because of its impact on the village of Send. Send would absorb additional traffic from the proposed 2000 houses at Wisley Airfield, 2000 at Gosden Hill and 1850 at Blackwell Farm. Send Road is already highly congested at peak times in particular and would not have the capacity to increase traffic load further. There would also be increase in noise and pollution in the village as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPS16/1824  Respondent: 15350081 / Tania Parslow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Fourthly, I object to the building of 40 houses and 2 traveller's pitches at Send Hill. This road is narrow and winding and the land is unsuitable as it is an ex landfill site which would be unsafe for development and is best left to be appreciated as an area of beautiful countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3931  Respondent: 15350081 / Tania Parslow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to state my objections to the current plans for development at Send.

Only today, Theresa May, as our new Prime Minister, reiterated her government’s commitment to protecting our Green Belt yet Guildford Borough Council seems to be committed to allowing vast expansion of our village to a point where it is in danger of losing its distinction and merging with Woking and Guildford. Once we lose our countryside it is lost forever and remains brownfield. With great advances in civil engineering and smart materials, surely there are more efficient ways of managing brownfield spaces in order to avoid this urban sprawl.

I shall outline my specific areas of objection:-

Firstly, I object to Send village being removed from the Green Belt as this was intended to be a permanent categorisation in order to protect our land from unscrupulous developers and those who might place financial interests over environmental concerns. We must retain Send’s village identity and prevent urban sprawl and loss of our countryside forever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Objections to Guildford Borough Council Proposed Submission Local Plan: Strategy and Sites (June 2016) and to the continued inclusion on the plan of the former Airfield, now known as Three Farm Meadows (TFM) - Allocation for the phased development of a new settlement of 2,068 dwellings.

Although I live outside the borough I use the borough for visiting friends who do live there. I object to the Local Plan for the following key reasons:
1. I object to the threat the local plan poses to the historic rural village of Ockham and the blight on properties there.

1. I object to the detrimental impact the proposed development of over 2,000 dwellings will have on a village with 159-residences. In particular this development and the associated increase in traffic will have a very detrimental impact on the environment, road safety and congestion.

1. I object to a plan which proposes that over 70% of new houses are built on land designated as Green Belt land in contrast to election manifesto promises made to the electorate.

I trust that these objections to the Local Plan will be fully considered and that the plans for development on the former Wisley Airfield (TFM) allocation A35 are now removed from the local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3946  Respondent: 15350273 / Molly Hutchins  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)
   There is too much traffic in these villages already and this plan will cause more congestion in Chilworth and Shalford, with no plan to improve that.

I wish these objections to be fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3945  Respondent: 15350273 / Molly Hutchins  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
2. I object to not protecting the Green Belt (Policy P2)
I object to removing Chilworth and Shalford from the Green Belt, and the resulting urban sprawl. I am a frequent visitor to this area and enjoy it's natural beauty.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3944  Respondent: 15350273 / Molly Hutchins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2016).

I object on these grounds:

1. I object to the Local Plan as the development proposed is not sustainable (Policy S1)
13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially the beautiful areas of Chilworth and Shalford. The local communities don’t need these houses. Chilworth and Shalford have inadequate bus and train services, so almost every adult will have to have a car.

The development should be in urban areas where there is sustainable transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3949  Respondent: 15350401 / James Wenman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I would like to support that Chilworth should come out of the green belt because its very difficult for young people to get on to the property ladder & most of the open space is within the green belt there are large amounts of open land mainly in the green belt so if we can then build more housing in the green belt then hopefully the younger generation could hopefully be able to buy a house in the local villages. We have to think about the future not the past...

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I have been a Guildford resident for almost thirty years, some of those in Ripley which I loved, and the remainder in Merrow and I am horrified at the revised plans to merge the villages along the A3 and the Hogs Back into one large housing estate. Apart from anything else, the A3 is already often gridlocked and any loss of the greenbelt would completely destroy the land surrounding Guildford forever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3954  Respondent: 15350465 / Shirley Dicker  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO the lack of immediate provision for new schools and doctors' surgeries.

At present Guildford remains a pleasant place to visit and in which to live but I have no doubt these plans would seriously affect the town not for the better.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3956  Respondent: 15350465 / Shirley Dicker  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The villages must not be destroyed and the Green Belt should remain.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3952  Respondent: 15350465 / Shirley Dicker  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In addition:

1. I OBJECT TO the disproportionate amount of development in one area of the Borough;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** SQLP16/736  **Respondent:** 15350465 / Shirley Dicker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

. I OBJECT TO the lack of evidence for the alleged housing need numbers

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** SQLP16/735  **Respondent:** 15350465 / Shirley Dicker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO the limited consultation period;

3. I OBJECT TO the last minute inclusion of new sites with less than 2 weeks notice

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>I wish to object to Send village being removed from the Green Belt. I also wish to object to the development of 40 houses and 2 traveller pitches on Send Hill. The location is inappropriate because of the narrow width of the road.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>2, The character and beauty of Guildford will be destroyed and the pleasure of living here will be lost for ever.</td>
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3. No specific plan has been given or has it been acknowledged how congested Guilford is already. Firstly the existing infrastructure needs to be sorted out and after that would be the time to get funding and expand the the roads and railways but this will need extensive investments.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/3960  **Respondent:** 15350561 / Janet Riddiford  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Both my husband and myself object strongly to the 2016 Draft Local Plan for the following reasons:- 1, An extremely large number of houses to be built in a relatively small area of Guildford which will completely change the villages and their contribution and ambiance of living in the area. If that number of houses are built there will be an enormous increase in the number of cars and general traffic in and around Guildford. The infrastructure cannot cope with the traffic at present and if on average every house has 2 cars this will increase this by up to 12000 regularly using the roads making it frustrating and dangerous.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/3967  **Respondent:** 15350561 / Janet Riddiford  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4, We have very precious green belt around Guildford which is enjoyed by thousands not only from the local area but from much further afield including the London area. We should look after this valuable asset because once it is destroyed it will be gone for ever.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/3978  **Respondent:** 15350625 / Jenny Schneider  **Agent:**
I am writing to let you know that I object to the proposed removal of Green Belt protection from Chilworth. The Green Belt is a very important principal for the containment of urban development and protection of green space to the benefit of a very large number of people. I am very concerned that this is being contemplated and urge you to rethink.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I OBJECT to building 45 houses at Clockbarn Nursery owing to inadequate access and traffic volume. Tannery Lane is far too narrow to take any more traffic. The junction with Send Road is already very hazardous for vehicles trying to join the main road. Planning permission has previously been given for 64 apartments at the Tannery and for building the Marina, both of which will generate additional heavy traffic. The junction is too dangerous already and will make it much worse.

The plan appears to be ill-though through and wholly irresponsible as it would have the following impact on the local community: -

- Threat to area of natural wildlife and beauty
- Ongoing threat of total erosion of the Green Belt and the wildlife it encompasses
- Destruction of a tranquil, peaceful environment
  - Disruption during the construction phase
- Noise from building work
- Roadworks causing intolerable traffic congestion
- The construction of trenches along Tannery Lane for additional drainage, electrical services and supply of mains gas (there is no supply of mains gas along Tannery Lane and beyond – residents are instead reliant on oil or LPG).
  - Concerns of additional traffic, which would cause gridlock as the narrow lanes are ill-equipped to cope.
Tannery Lane – when driving, care is required with pedestrians, where there is no pavement. Turning out of Tannery Lane into Send Road can be extremely hazardous as large vans tend to park close to the junction obstructing the view of traffic to the right and left. The junction would benefit from a mini roundabout. This situation is bad enough with existing traffic – it would become intolerable with extra traffic generated.

Papercourt Lane would become a rat-run – narrow passing points on blind bends – cars frequently have to pull over or reverse into passing points to allow traffic to pass through. My car was recently damaged by a large SUV which was struggling to get past it.

Newark Lane access into Ripley Village is narrow and barely copes with current traffic levels. The road was built in an era where vehicles were much narrower – today wide 4 wheel drive vehicles struggle to get past. There is no opportunity to increase the road width due to the proximity of legacy housing to the narrow pavements. Newark Lane towards Pyrford is narrow and twisty – even now extreme care has to be taken with cyclists and turning right into Warren Lane is currently very hazardous due to a blind bend, on a steep hill. Additional traffic levels would make driving along Newark Lane intolerable.

Send Road - even with existing traffic levels extreme traffic congestion was recently encountered towards Old Woking when temporary traffic lights were installed. With higher traffic volumes this gridlock would become intolerable.

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to building 400 houses and 7000 sq metres of Industrial space at Garlick’s Arch, opposite Send Marsh Road. The site floods and is covered by ancient woodland. The industrial space is not needed but if it were it should be at Slyfield. Guildford’s housing requirements have been shown to be grossly exaggerated and they have refused to disclose their calculations. There is already great pressure on local school and medical provision and this can only worsen. With proper use of brownfield sites this Green Belt is not needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to a new interchange with the A3 at Burnt Common because Send would have to take traffic from the proposed 2000 new houses at Wisley Airfield, 2000 houses at Gosden Hill, Burpham and 1850 at Blackwell Farm. Much of this traffic to and from the A3, M25, Woking and Guildford would go through Send. Send Road, which is already overloaded, would become gridlocked. Noise and pollution levels, already at excessive levels, would worsen. This must be avoided.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the removal from the Green Belt of the former Wisley Airfield, referred to as Three Farm Meadows, and
OBJECT to Allocation A35, the development of a new settlement of up to 2,100 dwellings, as a new settlement does not
accord with the
designation of the site as Green Belt and the Council has failed to provide the exceptional circumstances required by the
NPPF necessary to justify removal of the site from the Green Belt. It was accepted by the Leader of the Council at the
Advisory Board in April 2016 that the Objectively Assessed Needs (OAN) figure was exceeded. There is no need for the Council to exceed its OAN
but the Local Plan proposes to do so by causing harm. The OAN can be satisfied by development of more sustainable sites;
there is no need for A35 and so there cannot be any exceptional circumstances justifying it.

Green Belt

The Green Belt designation of the site prevents the sprawl of the urban areas of Guildford, Woking, Leatherhead and the
Metropolitan area. Previously developed parts of the site

such as the runway, taxiways and the aircraft hardstanding are all open and, therefore, buildings on these areas will cause
considerable harm to openness and the Green Belt. A new settlement would represent inappropriate development in the
Green Belt, would cause significant harm to the character of the surrounding area and significant harm to the setting of a
Listed Building. Development of this Green Belt site will discourage urban regeneration.

Sustainability

The Former Wisley Airfield is within the least accessible part of Guildford Borough, remote from rail stations with poor
local roads and lengthy bus routes and, given the proximity of the A3, it is implausible that development would be prove to
be attractive and safe for cyclists. The development is too small to be self-sustaining and yet large enough to cause
substantial adverse impact.

Deliverability

The site was subject of a recent planning application for a quantum of development comparable to that in the Proposed
Submission Local Plan and with a very similar boundary. The application was recommended for refusal and refused
unanimously in April 2016. Despite 15 months of negotiation with the applicant, Wisley Property Investment Ltd (WPIL),

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additional issues of impact on the Special Protection Area (SPA), impacts on the strategic and local highways network, sustainable transport, affordable housing, air quality and education could not be resolved. The failure of the planning application confirms that there is no reasonable prospect that the project can be delivered.

Soundness

The reasons for refusal of the planning application submitted by WPIL and the failure of the applicant to resolve issues for a proposed development comparable to the Local Plan allocation confirm that the allocation is unsound. The allocation i) does not provide sustainable development ii) is not supported by exceptional circumstances to justify removal of the Green Belt designation and iii) lacks realistic prospects of delivery.

I OBJECT to the removal of East Horsley and West Horsley from the Green Belt. The NPPF requires the provision of exceptional circumstances to justify alteration of the Green Belt Boundary. The Council has failed to provide the necessary justification. Therefore, allocations A36 Hotel at Guildford Road East Horsley, A37 land at the rear of Bell and Colvill Epsom Road West Horsley, A38 land west of West Horsley, A39 land near Horsley railway station Ockham Road North West Horsley, A40 land north West Horsley and A41 land south of West Horsley should be deleted as allocations for residential development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Too much development in one area of the borough but combined with the developments in other areas, will make Guildford one huge mass of villages which have joined together.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3988  Respondent: 15350785 / Rosemary Dresler  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Lack of details on essential infrastructure – the local schools have already expanded to take the existing capacity, doctors’, and the Royal Surrey are already stretched. The roads around Burpham and Guildford cannot cope with the existing amount of traffic – there are frequently delays getting into and out of Guildford as the A3 around the University and Royal Surrey are unable to cope. This leads to congestion around the Wooden Bridge, Ladymead and Stoke junctions. Any problems on the A3 cause all the traffic to come through Burpham which already has jams and congestion at rush hour along the London Road and Clay Lane without any additional traffic. In addition, the current roads are in a poor state of repair in many places.

The noise levels from the A3 and other local roads is already high – more traffic will make this worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3983  Respondent: 15350785 / Rosemary Dresler  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the 2016 Draft Local Plan for the following reasons:

Loss of green belt – this is an essential part of our local area and we are just five minutes from the Surrey Hills Area of Outstanding Natural Beauty. It is an essential part of everyone’s health and wellbeing to have these green spaces.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: SQLP16/739  Respondent: 15350785 / Rosemary Dresler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Lack of evidence for the alleged housing – where are all these new householders going to work? If they are commuting to London why do they need to be housed on green belt land? I have no objection to existing industrial sites and sensible garden developments taking place along with smaller scale developments but 2000 houses will double the size of our village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1847  Respondent: 15350817 / Brian Oliver  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the plan which relates to the site A46 and which would have effect of removing this site from greenbelt. It is common knowledge that only "very special circumstances" can ever justify such action.

We read that it was recently conceded as a result of an amendment put forward by Councillor David Bilbe that the only possible candidate for consideration as a very special need would be a proven requirement to build a new secondary school in Normandy. If it should be shown that such a building is not a requirement, the proposal as a whole should fail.

Local Councillor Keith Witham ascertained from personal discussions with appropriate head teachers that, on the contrary, there were many unfilled vacancies. Most schools in the area are under-subscribed and this adds up to a total of over 700 places. Furthermore, when in two years' time the planned new vacancies at the new 'financial College are added in, the total of over 1,000 vacancies will provide ample future provision. Any new secondary school in Normandy would clearly be superfluous. The cost and all the traffic overload at school term times would be unacceptable burdens with no compensatory elements.

The proposal to fill the area between Westwood Lane and Glaziers Lane with buildings would have the effect all by itself of turning Normandy village, a place of some character with beautiful views across the surrounding greenbelt area and which includes a splendid natural pond with a wide range of wildlife, into just another small town. It would be hardly exaggerating to state that that would blight the majority of Normandy people's lives. All the extra traffic would also add to problems with low-lying land and some flooding problems. (A cracked drain in Glaziers Lane has been acknowledged to have been caused by heavy traffic).
Traffic driving down from The Hog's Back into Normandy along Westwood Lane and often forking via Glaziers Lane and so merging with heavy traffic both westwards from Guildford and eastwards from Aldershot already causes constant hold-ups as well as damage to the road surfaces. The proposals would bring conditions to breaking point especially as Rushmore's imminent expansion by thousands of new homes will further to overload these routes.

I should expect further genuine attention being given to permitting more small developments on brown-field sites rather than attempting to build on the greenbelt areas in this heedless way.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1848  Respondent: 15350881 / Mark Hewson  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to take this opportunity to register my objection to the proposal to build 400 houses and 7000 sq metres of industrial space at Garlick's Arch.

- I object to Send Village being removed from the Green Belt status as I feel it is very important to retain the beauty of our countryside. The south east of England will become a concrete jungle if we don't take steps now to protect our ancient woodland and green space.
- I object to the already heavily congested local roads being subjected to further traffic.
- I object to the proposal for a new interchange to the A3 at Burnt Common which will result in further increase in traffic volumes through Send. The A3 is already subject to daily gridlock from high traffic volumes.

I hope the Council will decide the green belt can be respected so that it can continue to be enjoyed by future generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2907  Respondent: 15350881 / Mark Hewson  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to Policy A42 60 homes instead of the previous 45 as this will further contribute to traffic congestion, pollution and loss of green belt in what is a beautiful part of countryside close to the River Wey.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2908  Respondent: 15350881 / Mark Hewson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A43 addition of 8 travelling/showpeople pitches as this will involve destruction of the green belt without any "exceptional circumstances" existing. Will also place additional traffic to the villages of Send and Ripley which are already heavily congested.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2909  Respondent: 15350881 / Mark Hewson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Land at Burnt Common London Road being allocated for 7000sq metres of industrial space Policy A58. This is unnecessary as there it would be irresponsible to future generations to develop green belt land where there are many other sites which could be used for industrial space. The Send area is being allocated a disproportionate amount of development which will impact the small roads and lead to the area becoming a cut through to the A3. The word minimum has been changed from the previous maximum which opens up the site to future further development beyond what is in the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4006  Respondent: 15351521 / Pamela Bristow  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

I object to Policy A42 60 homes instead of the previous 45 as this will further contribute to traffic congestion, pollution and loss of green belt in what is a beautiful part of countryside close to the River Wey.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Where will the new residents work? Is there employment vacancies in the area? Does it mean more people have to commute to London, will there be capacity on the rail network?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4005  Respondent: 15351521 / Pamela Bristow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The proposed number of houses to be built in and around the village in a relatively short time which would seriously impact on local amenities

1. Public transport is almost non-existent therefore more and more cars will be using the roads which are already very busy particularly at school times.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4004  Respondent: 15351521 / Pamela Bristow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the proposed Guildford Local Plan 2016 for the following reasons;

1. The removal of the Green Belt status around West Horsley which has been fiercely protected for a long time.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4007  Respondent: 15351521 / Pamela Bristow  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The number of new houses to be built in West Horsley seem to be out of proportion to other areas of the Borough

In view of these points I would like my objection to be noted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1851  Respondent: 15351553 / David Paton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2. Wisley Airfield.

I object to the building of 2000 house on the Wisley airfield. The case for so much additional local housing is not made. The pressures from additional nearby homes, people and dogs will jeopardise conservation efforts to preserve a rare habitat for nature at Ockham Heath. The narrow feeder roads will struggle to cope with additional traffic and there will be increased congestion at junctions to nearby main roads. In combination with the other planned developments in the Horsleys, the Wisley site development will create a large block of suburbia in what was previously a mixed semi-rural community.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **Changes in the boundaries will make future building beyond this plan able to encroach on more green spaces.**

I object to the proposed change to the Settlement area. Our village and locality will become just an extension of Greater London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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5. **Station Parade should not be a district centre**

I object to Station Parade being classified as a District Centre. In my opinion it is not appropriate as a place for more urban development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. **Lack of planned infrastructure.**

The Plan does not make provision for increasing the availability of public transport alternatives to private motor vehicle use, especially for additional places on local commuter trains or in station car parks.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/4008  **Respondent:** 15351553 / David Paton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the following aspects of the new proposals for the local plan and how it will affect my local environment and community.

1. **Removal of the Horsleys from the green belt**

I object to removing the Horsley's from the green belt. Greater London is already a huge urban sprawl that should not be extended. A mix of urban and more rural environments benefits the whole community.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPA16/1104  **Respondent:** 15351585 / Anne Taylor  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT most strongly to the removal of EAST and WEST HORSLEY form the GREEN BELT.

A ring of GREEN around London was meant to PREVENT LARGE SCALE URBANIZATION of GREATER LONDON.

I further object to the incredibly large number of houses allocated to EAST and WEST HORSLEY making the two closely linked villages totally unrecognizable from what they are today, with many very old houses, and most of the rest built to reflect and fit in with semi-rural surroundings. I have lived in Surrey for 60 years, 36 in West Horsley, and there has already been considerable development, but not on the scale now proposed, from SEMI-RURAL to URBAN.
Surely further use of BROWN-FIELD sites in GUILDFORD which is now a City and already has many high-rise buildings could be accomplished with careful planning.

Roads, schools, hospitals, public transport (both rail and road), water supplies and sewerage will be adversely affected and will need to be enlarged and up-dated causing considerable disruption to two small villages.

So many extra properties will bring a significant number of extra cars - local traffic is already considerable in the morning rush-hour and also from mid-afternoon when schools close, through to the evening rush-hour.

Many local people and visitors enjoy WALKING and CYCLING in this area, both for recreation and to observe the considerable amount of wild-life - which if this URBANIZATION proceeds will not be available for future generations.

Many areas of this country would welcome housing development and new businesses to provide JOBS and good housing - THERE IS NO SHORTAGE OF JOBS in LONDON and the SOUTH EAST.

I understand that we cannot stand still completely, but please not on so LARGE a scale, and certainly retaining the precious GREEN BELT - once it is gone we cannot ever have it back.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPA16/1105 | Respondent: 15351617 / Patricia George | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
| 1. The plan is unsound and the road network is unplanned and purely aspirational. |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |

| Comment ID: PSLPS16/1852 | Respondent: 15351617 / Patricia George | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
1. You have not provided a clear and structured plan of how and when you propose to deal with the sewage from the new Gosden Hill houses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4012  Respondent: 15351617 / Patricia George  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the 2016 Draft Local Plan for the following reasons:

Infrastructure:

1. The Aldi roundabout is frequently gridlocked. When the Aldi juggernaut lorries make deliveries it is impossible for local residents to gain access to their houses. Additional traffic from the Gosden Hill development would exacerbate the situation. You have not provided a clear plan of how you will widen the roads and Aldi roundabout or how the additional traffic would access the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1106  Respondent: 15351873 / Magaret Winborn  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO lack of evidence to the need for more housing in the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1858  Respondent: 15351873 / Magaret Winborn  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO site A25, Gosden Hill Farm. How can you warrant 2000 homes being built on the Green Belt, it will cause massive implications to the surrounding area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1859  Respondent: 15351873 / Magaret Winborn  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO site A35 Wisley airfield. The development of 2000 homes are unsustainable and totally inappropriate in the Green Belt area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1855  Respondent: 15351873 / Magaret Winborn  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO the site A43 Garlicks Arch included at later stage.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/1856  Respondent: 15351873 / Magaret Winborn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO the on and off ramp at site A43a Burnt Common/ Clandon Road. This will cause the traffic to be railroaded through the villages and result in increased traffic problems.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1857  Respondent: 15351873 / Magaret Winborn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO site A45 the Talbot. This is a conservation area and will cause over development in an area that does not need it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1860  Respondent: 15351873 / Magaret Winborn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT TO site A57 The paddocks. Four!!!! traveller pitches are totally out of the question.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
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<th>Comment ID:</th>
<th>PSLPP16/4018</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO the development of so many houses in one area of the Borough. Schools, public services and medical facilities are stretched so cannot take any increase.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
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<th>Comment ID:</th>
<th>PSLPP16/4016</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO the removal of any villages from the Green Belt i.e in-setting. When will this stop, we'll have no green spaces left.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/4013</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
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<th>Comment ID: PSLPP16/4031</th>
<th>Respondent: 15352001 / John Edwards</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

I OBJECT to the local plan policy S1, the development planned is in no way sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/1863</th>
<th>Respondent: 15352065 / Daniel Sinclair</th>
<th>Agent:</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

It is proposed by the Council that a number of villages in the Guildford area are to have protection from the Green Belt removed and this means that there would be no protection against development.

One of the reasons I live in Chilworth is because it is a village that sits within open and beautiful countryside and it would be disastrous to allow ribbon development, which is what would happen.

More housing would produce a greater amount of traffic onto our already overcrowded roads and lanes.

The Conservatives were voted in with a promise that they would protect the Green Belt. If this policy is carried out it would be a betrayal that will be remembered at the next elections.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The proposals for Wisley airfield falls exactly into this category...GBC are trying to justify the development under unfulfilled housing need (which has been exaggerated at best) and in any case unfulfilled housing need is not sufficient argument to build on green belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4036  Respondent: 15352065 / Daniel Sinclair  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The proposal not to grant Effingham junction PTI status is baffling since the very arguments used to further Horsley stations claims are used against Effingham Junction. EJ plans just as an important role and is far more accessible than Horsley and should have PTI status.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4037  Respondent: 15352065 / Daniel Sinclair  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do support the designation of Bishopsmead Parade, East Horsley, as a rural Local Centre under the draft Local Plan and the designation of Station Parade, East Horsley, as a District Centre under the draft Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4033  Respondent: 15352065 / Daniel Sinclair  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The affordable homes policy is laudable but GBC are planning on building them in the area of least demand where transport links are not good and there are limited jobs. In fact the demand in the village is for affordable three bed homes, contrary to what BC have outlined. The plans fail the test of sustainability on many counts, including this one.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4035  Respondent: 15352065 / Daniel Sinclair  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The proposed boundary changes would devastate the only open green communal area in East Horsley, Kingston meadows and other boundary changes are ridiculous in that they ignore natural boundaries which exist and are currently used (such as a deep drainage ditch) and would seek to move these to further the machinations of the developers. The arguments for the boundary changes are therefore invalid.

By changing the boundary to include area past the A246..and infilling in the spaces, you are threatening the green belt in the same way as new developments and I view this with the same scepticism and unless the boundary changes can be lawfully justified, they are invalid too.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4032  Respondent: 15352065 / Daniel Sinclair  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am writing to express my complete dissatisfaction with the proposed local plan. In many ways it is in breach of regulations and facts have been misrepresented by GBC.

My main objections are as follows: I am not able to express them in legal jargon but these are the feelings of 90% or greater of the two villages of East and West Horsley. The Surrey Hills AONB is one of the great treasures of Guildford Borough and I strongly believe that protecting this area should be given the highest priority.

The opening statement of Policy P2 that “We will continue to protect the Metropolitan Green Belt” is blatantly disregarded all the way through this local plan. GBC appears to be in breach of this policy through the housing policies it has set out in the Proposed Submission Local Plan, whereby some 65% of developments will be made on land that is currently Green Belt. It is not a Government directive to build on greenbelt land as GBC present it and would have us believe. In fact Government guidelines say that greenbelt land should only be built on in. The local plan does not make nearly enough argument for ANY of the proposed greenbelt land developments to be considered ‘exceptional circumstances’. You have a duty to protect the greenbelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/4038  **Respondent:** 15352065 / Daniel Sinclair  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In all, the draft plan is flawed in the extreme and GBC’s insistence on forcing developments where there is no proven need and riding roughshod over laws put in place to protect our valuable green spaces must be prevented at all costs. This plan must be rejected apart from the areas which I have identified.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/4034  **Respondent:** 15352065 / Daniel Sinclair  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
West Horsley is being considered as two separate plots and therefore the allocation of housing is increased due to this. I feel baffled as to why West Horsley is split into North and South since it has only one small section of shops near Bell and Colville. The village should be considered as one entity. When viewed as such, it is clear that the proposed density of housing is an extraordinarily high percentage, once again far outstripping identified need, none of which warrants building on green belt land, or reclassifying green belt land because there are no exceptional circumstances.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/746</th>
<th>Respondent: 15352065 / Daniel Sinclair</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The need for housing projected over the next few years is far lower than GBC are supposedly making provision for. What you are proposing in effect is a 35% increase in housing in two small villages which barely have the facilities and infrastructure to cope with the population as it stands. This is unprecedented and far beyond anything proposed elsewhere in the borough. It is completely unreasonable especially since predicted growth in the area is much nearer 15%. GBC has voluntarily chosen to pursue a policy of aggressive civic and economic expansion which underpins all of the housing policies in the Local Plan. GBC’s target of a 25% increase in housing stock is entirely down to a political choice made by GBC and well in excess of the official statisticians’ forecasts. Why are GBC pursuing this aggressive house building project when there is no proof of demand?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/4041</th>
<th>Respondent: 15352321 / Nick Wooff</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

There is too much traffic in these villages already and this plan will cause more congestion in Chilworth and Shalford, with no plan to improve that.

I wish these objections to be fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4040  Respondent: 15352321 / Nick Wooff  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to not protecting the Green Belt (Policy P2)

I object to removing Chilworth and Shalford from the Green Belt, and the resulting urban sprawl. I am a frequent visitor to this area and enjoy it's natural beauty.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4039  Respondent: 15352321 / Nick Wooff  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2016).

I object on these grounds:

1. I object to the Local Plan as the development proposed is not sustainable (Policy S1)
13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially the beautiful areas of Chilworth and Shalford. The local communities don’t need these houses. Chilworth and Shalford have inadequate bus and train services, so almost every adult will have to have a car.

The development should be in urban areas where there is sustainable transport.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/1865</th>
<th>Respondent: 15352417 / Bernard Parke</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A21</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

I support this policy of retaining this land for allotment as such sites are not only in great demand but provides much needed recreation facilities within the Borough.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: pslp172/639</th>
<th>Respondent: 15352417 / Bernard Parke</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
As a resident in this area I am greatly concerned over the impact not only here on our green belt, but on the constant traffic congestion that we experience on the A31 one which is a through road leading to the A281.

The A3 also experiences not only congestion but seems to have a frequency of RTAs.

We do not have the infrastructure to support this proposal which certainly not solve our need to provide “affordable” housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to the proposal of removing Green Belt Protection to Chilworth Village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- Destroy view from the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat running through local roads
- Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4050  Respondent: 15353025 / David Helm  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the local plan all our infrastructure is overloaded now.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1872  Respondent: 15353057 / Sanjeet Kohli  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- Destroy view from the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat running through local roads
- Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1873  Respondent: 15353089 / Alison Teece  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to building 45 houses at Clockbarn Nursery. This area already cannot cope with traffic volumes and the junction with Send Road is already very hazardous. Permission has already been granted for 64 apartments and for building the marina. The infrastructure cannot cope with more traffic and vehicles in this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1874  Respondent: 15353089 / Alison Teece  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to building 400 houses and 7000sq metres of industrial space at Garlick's Arch. This area is known to flood. It is part of the Green Belt and is covered by ancient woodland. With proper use of brownfield sites, this Green Belt site is not needed. It would also add additional traffic to the Portsmouth Road and through both Ripley and Send. The local area does not have capacity at the doctors surgery or at the local primary schools. There is already huge concerns by current local residents about the lack of secondary school places for this area, to which this would add increased demand.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I Object to Send Village being removed from the Green Belt. The Green belt was intended to be permanent under the National Planning Policy Framework and there are no special circumstances that justify abandoning it. Both local councillors and central government gave a clear election promise to protect the Green Belt and this reneges on it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to the disproportionate amount of development in one area of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
If you're keen to use the green belt, go further afield to the outskirts...and build smaller premises for smaller shops to grow new businesses.

...Normandy or Ash...so many places to choose from.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Create a new area with its own holistic health clinic, school, shops and everything for a new community, including cycle tracks and maybe some stables for horses to be used on the land and for transport too.

This is a practical and fair way forward we think.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Answer (if comment is on questions 1-7 of the questionnaire): ()

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
There is simply not the infrastructure in place for this to happen

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/4053</th>
<th>Respondent: 15353217 / Vali Drummond</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I want to record my objection to s many houses being built on the green belt near Guildford, or anywhere around the area actually.

Already the traffic ques are sometimes for hours!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/4056</th>
<th>Respondent: 15353217 / Vali Drummond</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Reclaim some of the MOD land that owns Acres & acres around pirbright

= BUILD ON THAT!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPS16/1875</th>
<th>Respondent: 15353249 / Paul Harris</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- Destroy view from the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat running through local roads
- Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4060  Respondent: 15353345 / Mike Mellstrom  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have lived in Horsley since a child in the 60's and attended local schools in that time i have seen a massive change in the facilities and infrastructure of the village and local area.

Already the roads around Horsley are pot holed and in bad repair the A3 is now bottled necked everyday around Junction 10 M25.

The waiting time to get an appointment at the local doctors is now over 2 weeks and there are no places at the local schools.

All this is before any of the proposed 593 houses in the Horsley as well as the possible 2000 at Wisley i strongly feel that Horsley cannot support this level of development.

With all these projects it will be a few developers and land owners who will make a massive profit and the local community who will once more suffer.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1876  Respondent: 15353409 / Sheila Mary Bailey  Agent:
We object to Guildford Borough Council’s draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- Destroy view from the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat running through local roads
- Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am writing to object to the inappropriate proposals to develop a large number of houses on Wisley Airfield and in the villages of East and West Horsley.

Collectively, you have failed to take into account the widespread resentment of your proposals in the local communities. In particular,

1) the residents within these communities have chosen to live in rural/semi rural surroundings. If they had wanted urbanisation then they would be living in better serviced and valued areas like Guildford or Surbiton. Our area is a magnet to visiting tourists from London and the surrounding areas to enjoy its beauty, unique wildlife and beautiful vistas in harmony with their surroundings. The amount of cyclists using our area is ever increasing and that is just one example of why it is important to protect our environment. This has a social and economic value.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/4065</th>
<th>Respondent: 15353505 / Susan Mazalon</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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</table>

3) The impact on our local services will be highly detrimental. Already, the stress of getting into the local doctors surgery at a suitable time or even just finding a suitable place to park can be very stressful to a large number of older residents in particular. Parking in the village is already poor especially at the weekend where even a minor event such as a wedding can make it extremely difficult. How will schooling cope? You are already adding to a county wide crisis of building more new homes with ever decreasing neighbourhood facilities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<th>Comment ID: PSLPP16/4068</th>
<th>Respondent: 15353505 / Susan Mazalon</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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</table>
Finally, if you feel the need to do a Milton Keynes style attack on some of our finest landscapes then consider further down the A3 corridor towards Guildford where the current car boot sale is held. This may give easier access onto the A3 by being on a straight stretch away from junctions and the damage to the landscape and environment is arguably more "acceptable" as it is arguably less polluting and gives a speedy access to the shops and facilities of Guildford and Burpham.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4064  Respondent: 15353505 / Susan Mazalon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2) The roads in our area are VERY poor. The conduct of the authorities in maintaining them is also poor. They are largely narrow lanes but with the increased traffic it can only make the situation worse for health and safety reasons.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4066  Respondent: 15353505 / Susan Mazalon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The roads around East Horsley from 7am onwards are VERY busy. It can take up to 20 minutes on occasions just to cross the Effingham crossroads on the A246. Any additional housing of the scale you are proposing could lead to gridlock and again safety and pollution concerns in a wider area leading to the increased need for additional policing. Has this been included in your planning?

5) Local transport is very poor meaning ever increasing car journeys on ever more dangerous roads. There is virtually no existing infrastructure to accommodate these developments or very low levels of local employment which leads to increased traffic and environmental damage. The junction currently close to the Ockham Bites café onto the A3 is HIGHLY DANGEROUS. The traffic flow here is very fast and dense making it extremely difficult to join the road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/4067</th>
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<td>6) Within East and West Horsley once again the scale of these developments and some like on the Thatchers hotel site are on pristine land that I believe has never been sprayed by agri chemicals. Surely something to cherish.</td>
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<th>Agent:</th>
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<tr>
<th>Comment ID: PSLPA16/1108</th>
<th>Respondent: 15353633 / Neal Stone</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Clandon</td>
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</table>
I OBJECT to adding a station at West Clandon (shown on map at page 18, but made no mention of elsewhere in the document that I can find), which will add tremendous burden onto all local services, not least loading up train services by the time they reach Horsley (which at peak times are already full by the time they reach Oxshott).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1107  Respondent: 15353633 / Neal Stone  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

7. I OBJECT especially to Policies A36, A37, A38, A39, A40 and A41: all of the proposed Horsley sites for all the reasons stated in my introduction. I am aware of no local support for these plans. The amount of new housing proposed far exceeds local need. The proposed density of construction is too high (approx. 37 dwellings/hectare at A36) compared with existing development (approx. 8 dwellings/hectare around that site). The sites proposed are unsustainable with no supporting plans for enhanced services e.g. wastewater, schools, traffic management, flooding. No account is taken of impact of suggested Wisley Airfield site development. The inset lines suggested seem arbitrarily drawn and do not feel at all in keeping with the actual spaces on the ground e.g. some streets have houses on only one side so to develop opposite would be ruinous. Policies A37, A38, A40 and A41 require moves to the Green Belt, which I fundamentally disagree with and are contrary to Local Plan Policy P2 which states “we will continue to protect the Metropolitan Green Belt.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4266  Respondent: 15353633 / Neal Stone  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to OBJECT to the Proposed Submission of the Guildford Local Plan: Strategies and Sites June 2016 as it is in its current format.

I have tried to be objective as this is of historical, environmental and social importance. I have read the local press, looked at the GBC website, videos and Plan (very hard to read and scrutinise), been to local meetings and spoken to local people to get a balanced view.
I was brought up in Walton-On-Thames where my parents still live so I have called this area home for the past 40 years. A year ago I returned to Surrey with my husband and young son to live in West Horsley. I was fortunate to be brought up in the area and very happy to have been able to return here now.

We moved here to be close to family and friends, enjoy the more rural aspects of life and leave the hustle of London. However having known the area so long I am aware of the problems the area faces already such as severe congestion, overcrowded trains, enormous infilling of housing (radically changing the look and feel of the area, especially Walton and Weybridge), over stretched schools and health facilities. I am a nurse and I am very aware of the existing pressures on local health facilities.

My three main objections to the Local Plan are therefore:

• Erosion of the immensely precious Green Belt by redefining the boundaries; “the essential characteristics of Green Belts are their openness and their permanence” (Department for Communities & Local Government) both of which will be irrevocably lost if this Plan goes ahead. I feel that the “exceptional circumstances” needed to justify this environmentally devastating change have not been demonstrated by the Guildford Borough Council Local Plan.

• A very worrying lack of provision of infrastructure in the Plan to cope with the disproportionate scale of the proposal. Health, education, transport, sewerage are all currently under pressure and not convincingly addressed in the proposal. For our village, West Horsley, the Guildford Plan does not even consider the need for extra local services but the schools, the GP, the roads, the car parks are full, the bus service basic, the roads suffering severely from potholes and the area is subject to flooding and sewerage problems.

• The scale and density of the proposed plan is alarming which has not been satisfactorily explained in the GBC Plan. GBC has not revealed how it has arrived to the conclusion that such expansion and development is needed. In which case how can such potentially environmentally catastrophic changes even be put forward? How does this comply with Government guidelines?

From a far more local perspective, i.e living in West Horsley I am extremely alarmed at the density and scale of the proposed Green Belt change in the Horsleys and the density of permitted housing proposed. Why on earth is there a proposal for a 35% increase in new housing for West Horsley (the highest % than any other borough) when the allowance for surrounding villages is so much lower and for Guildford Town centre only 11%? I understand that Guildford University has available land for building and yet this is somehow being protected? Surely building there would be of greater local use than farther afield villages for university and hospital workers?

Furthermore the density of housing proposed in the Horsleys is not in keeping with the current local density of housing which will permanently change the community feel and look. The Key Evidence given in the Guildford Borough Economic Strategy 2013-31 does not explain the need or demand for this huge increase in housing, i.e 148 houses in East Horsley and 385 houses in West Horsley. And this number does not take into account any potential future developments once the villages are taken out of the Green Belt.

With regards to the surrounding villages and areas I am also very alarmed at, and object to, the scale and number of proposed sites which are all within the vicinity of the A3 dual carriageway: Wisley Village (2068 houses), Garlick’s Arch, Send Marsh, Ripley (400 houses), Gosden Hill Farm (2000 houses). This road and surrounding roads struggle daily to cope with heavy congestion. The proposals will only worsen this and the pollution increase yet further. With scarce and unreliable local transport and hence heavy reliance on private cars how can this proposal be realistically sustainable?

The proposed Wisley Airfield village (or more correctly new town) is incredibly close to Ockham, Ripley and the Horsleys. The repercussions on the Horsleys and the already over subscribed schools and GPs will be immense. I object strongly to this large scale development and understand that again the local infrastructure will not cope with this new town.

I have also been concerned to read that despite 20,000 objections to the 2014 Plan the New Plan 2016 is barely different and in fact the number of houses to be built per year is more than in 2014 Plan.

I wholeheartedly hope that local objection will force this Plan to be rejected on the grounds of un-sustainability, excessive scale, environmental repercussions, density, lack of infrastructure, lack of demand and most importantly the unrecoverable loss of precious Green Belt protection.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1886  Respondent: 15353633 / Neal Stone  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

11. I OBJECT to Policy A25: Gosden Hill Farm, which is massively out of proportion and will add tremendous burden onto all local services.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1883  Respondent: 15353633 / Neal Stone  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

8. I OBJECT to Policy A35: the proposed Wisley Airfield development which is completely out of keeping with the will add tremendous burden onto all local services. Only a small proportion of the site is brownfield (not totally as stated). It will add traffic to the already busy M25/J10/A3 junction. The number of houses suggested will ruin Ockham conservation area. The development would have a major negative impact on Horsleys facilities such as shops, trains, health centre etc.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1884  Respondent: 15353633 / Neal Stone  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
10. I OBJECT to Policy A43: Garlick’s Arch etc. site which is massively out of proportion and will add tremendous burden onto all local services.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

As any good citizen I understand the need to develop housing – especially that which is affordable for key workers. However, development must surely always be kept in check with the tone and style and density of the local spaces as well as the amenities that serve those communities. The suggested development areas earmarked in the Horsleys and the surrounding areas particularly Gosden Hill Farm and Wisley Airfield are completely out of proportion of the existing neighbourhoods and would change the feel of the local area irrevocably. And of course, other knock-on effects such as increased traffic and pollution are inevitable along with immense strain on services.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I suggest you really do listen to the voices of people from the communities that you serve and withdraw and then fundamentally rethink your proposed 2016 plan. Furthermore I would suggest that you truly engage with the communities that you serve and embrace their good ideas and criticism. The proposed submission is completely out of keeping with the local rural neighbourhoods and would be ruinous for generations to come, who will not get to enjoy the bucolic green spaces that their parents moved here for.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4078  Respondent: 15353633 / Neal Stone  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2. I OBJECT to Policy H1: you should compel the university to use its own space first of all to house students. This would surely have the effect of freeing up some housing space in town for those most in need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4081  Respondent: 15353633 / Neal Stone  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

5. I OBJECT to Policy I1: there is very poor consideration for the infrastructure needed to support the proposed changes. Such lack of consideration calls the thoroughness of the entire document into question for me. Local roads are hardly considered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4073  Respondent: 15353633 / Neal Stone  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Potholes on East Lane have not been attended to in the year that we’ve lived here (despite reporting them) with existing traffic levels. And yet the plan proposes to add 35% more households into the

Horsleys? Imagine the increased use that our roads will take, not to mention the jump in traffic noise, road safety and pollution. Even with only one car per household (and most rural households seem to have at least two cars given public transport is so poor) that is an increase of 3000 cars in our immediate area alone. Have you ever tried to park at Horsley or Effingham Junction station in the rush hour, or had to wait for a space to park by the East Horsley shops? Our wonderful Horsley Medical Centre already seems to be running at capacity, with some waits at times to be seen. More households will add additional strain on already overstretched services locally and regionally. Have you ever seen the car park at Royal Surrey hospital mid morning or had to wait in A&E at Royal Surrey with a toddler? How many more consultants, registrars and nursing staff at Royal Surrey have been allowed for in your plans?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4082  Respondent: 15353633 / Neal Stone  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

6. I OBJECT to Policy I3: which ignores the current scarcity of rural transport and makes no mention of the dilapidated state of Surrey’s roads. The policy ignores the additional strains placed on the transport system by the thousands of houses proposed. For the railway, where are the suggested longer platforms, or more frequent trains, or early or late services, or toilets on rolling stock to support the plan?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4075  Respondent: 15353633 / Neal Stone  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Might it be more sensible to focus more modest development areas around those which are already significantly urban, rather than eradicating the protection afforded by the Metropolitan Green Belt? I was heartened by your statement in P2 that “we will continue to protect the Metropolitan Green Belt” but this is contrary to various Policies elsewhere. Your plan as it relates to the Horsleys and local environs seems to me to be completely out of keeping and proposes one of the greatest and fastest increases in housing numbers which is way beyond what seems in keeping, threatening villages that have grown very slowly over centuries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/4079</th>
<th>Respondent:</th>
<th>15353633 / Neal Stone</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td></td>
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</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

3. I OBJECT to Policy P2: your proposal to move (and effectively eradicate in places) the Metropolitan Green Belt in order to allow development of our precious green spaces. The green belt was instigated with a brilliant single idea in mind, which was to prevent urban sprawl and your plan demonstrates scant regard for its protection. All these spaces are discussed as potential land for development and I am shocked that there are no balancing values offered for enjoyment of these spaces for leisure, tourism, public health and wellbeing, biodiversity or natural heritage.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/4080</th>
<th>Respondent:</th>
<th>15353633 / Neal Stone</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P3</td>
<td></td>
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</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

4. I OBJECT to Policy P3: a minor extension of Metropolitan Green Belt here in Ash and Tongham seems not justify the greater changes proposed in P2 et al for insetting villages. Also, why is this ward (represented by the current Council Leader) given special treatment and called out specifically for protection?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLP16/4077  Respondent: 15353633 / Neal Stone  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to Policy S2: since surely Brexit invalidates the demographic data. Also there is no definite housing target given, which leaves the policy too open to future interpretation. The overarching impact of the plan being put in place would be to create an urban corridor connecting to the London suburbs, which would be devastating to the feel of local communities. Surely the policies cannot be seen in isolation since the effect of one on another is so significant.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/751  Respondent: 15353633 / Neal Stone  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECTION TO THE GUILDFORD LOCAL PLAN (sent by email)

A little over one year ago my wife and I moved to West Horsley from West London with our young son. We moved here away from the hustle and bustle of everyday London life, its density of housing and lack of green open spaces both for us to enjoy and our son to explore. West Horsley is the epitome of what we sought in leaving London: A peaceful, community-spirited, spread out village with local shops with acres of open, pleasant green spaces in and around to enjoy whilst being really well connected to the main roads, railways and airports.

I have tried my best to understand the Guildford Borough Proposed Submission Local Plan: June 2016, but have found it very complex and frankly unwieldy to digest. For your information, the links to Appendices B-E are missing from your website at http://www.guildford.gov.uk/newlocalplan/proposedsubmission

Despite your claims to have ‘listened’ to citizens following the last version of the plan it seems as though very little has changed and, in fact, more development is now being tabled than before. I am writing to OBJECT to the Guildford Borough Proposed Submission Local Plan: June 2016.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/546  Respondent: 15353633 / Neal Stone  Agent: 
I welcome the reduction in the number of new homes being proposed in West Horsley, but this does not go far enough in reducing the still very large number of properties proposed on the green belt in East and West Horsley. It also has the effect of making the eastern side of the borough take a greater proportion of the proposed developments.

Additionally, despite the reduction in proposed dwellings, there is no corresponding uplift in the sustainability of amenities, infrastructure or services such as shops, medical centre, library and Horsley Station proposed.

I also wish to note that Guildford is choosing not to constrain its overall housing growth like many other councils. I understand that the proposed dwelling building plan provides homes for a population estimate that is over DOUBLE the Office for National Statistics predictions for the same period.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

We object to Guildford Borough Council’s draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- Destroy view from the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat running through local roads
- Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1109  Respondent: 15353825 / Terry Madgwick  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Lack of specific details of essential infrastructure - drainage being the most serious, but all of the communal facilities needed to sustain a large residential area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1887  Respondent: 15353825 / Terry Madgwick  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Having been briefed on the inadequacy of detailed thoroughfares, surely as was the case with the Slyfield development plans, commitment to remedying the wholly inadequate stretch of the A3 around Guildford must precede any decisions about Gosden Hill development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4083  Respondent: 15353825  Terry Madgwick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write to register my objection to the 2016 Draft Local Plan.

There are a whole raft of well-documented reasons for complaint ....

· Loss of Green Belt when it is abundantly clear that "brown field sites" remain under-utilised.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4084  Respondent: 15353825  Terry Madgwick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Disproportionate level of development in one area of the Borough - not so much the number of houses within the Burpham itself, the area in which I live, but the disastrous impact of yet more through traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/752  Respondent: 15353825  Terry Madgwick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The new dynamic of consequences of BREXIT surely also impact the overall picture.

· Lack of evidence for alleged housing need numbers – upon what evidence is the figure of 693 a year arrived at, and why is that more than double the previous figure given in 2012 of 322?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/753  Respondent: 15353825 / Terry Madgwick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

· The limited consultation period - I'm dashing this off on the morning that I'm going on holiday - does no credit to democratic process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1885  Respondent: 15353857 / Carolyn Lucas  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

· Destroy view from the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
· Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
· Increase tailbacks on the A31 and traffic congestion
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1895  Respondent: 15354305 / Ben Webb  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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• Increase tailbacks on the A31 and traffic congestion
• Result in rat running through local roads
• Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1899  Respondent: 15354369 / Janet Rejemortel  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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• Result in rat running through local roads
• Add to Guildford’s pollution
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/1901  **Respondent:** 15354529 / S. Burton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

We object to Guildford Borough Council’s draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

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- Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp172/892  **Respondent:** 15354529 / S. Burton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1917  Respondent: 15355169 / Bridget Turner  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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- Increase tailbacks on the A31 and traffic congestion
- Result in rat running through local roads
- Add to Guildford’s pollution
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1918  Respondent: 15355297 / Lilian Julia Barratt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1919  Respondent: 15355361 / Jennifer Brockless  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write to register my strong objection to the New draft Local Plan.

I cannot understand why, after the GBC Planning Committee unanimously rejected the proposal for 2,000 homes (mostly on the site of the former Wisley Airfield), it has again been included in the plan; an explanation of this repeated inclusion should be made public in conjunction with clarification of the new reasons that justify it.

Much of this development would be adjacent to the Nature Reserves of Wisley and Ockham Commons and Chatley Heath. Substantial parts of this land have SSSI designations and development adjacent to such is forbidden under Natural England's Wildlife and Countryside Act 1981 and Access to the Countryside Act 1949 - amended by schedule 11 Natural
Environmental and Rural Committees Act 2006. You need to make public the proposed and actual consultations that you have had (and intend to have) with Natural England regarding the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4132  
Respondent: 15355361 / Jennifer Brockless  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

No thought seems to have been given to the traffic congestion that will inevitably ensue; the only station with a good service to London is Woking, and anyone who travels to Woking from the Ripley, Send or Clandon areas will have already experienced the frustrating drive to Woking Station - the roads are not good enough for the present traffic let alone the additional traffic from the proposed development. Increased air pollution will also result from extra traffic.

Many of the local lanes have no pavements or paths for pedestrians and are narrow. Any increase in traffic (especially lorry traffic) will bring real danger to motorists, cyclists and pedestrians. The provision of cycle lanes is sporadic.

The poor state of repair of many of these roads seems to indicate that The Council already finds maintaining them difficult; a greatly increased volume of traffic will inevitably stretch resources even further.

This development is out of all proportion in relation to the currently existing infrastructure. Where are the plans that detail how this infrastructure problem will be solved?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4131  
Respondent: 15355361 / Jennifer Brockless  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
To remove Ripley, Send and Clandon from the Green Belt would create an amorphous suburban sprawl out of the three villages and, as such, compromise their identities. According to the National Planning Policy Framework set out by the Government in 2012, "There is a general presumption against inappropriate development, unless very special circumstances can be demonstrated to show that the benefits of development outweigh the harm caused to the green belt." (NPPF.2012). Beyond the need for new housing (which, as a reason, does not amount to "very special circumstances"), there is little in the new plan that satisfies this stipulation. Indeed, the following concerns (largely relating to infrastructure) would appear to demonstrate the opposite to be true.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1365  Respondent: 15355361 / Jennifer Brockless  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The proposal to increase the size of the site for development will lead to even greater numbers of vehicles on roads which are not designed for even the present volume of traffic. The delays around the M25 Junction 10 slip roads have recently led to long build-ups on the A3 so how on earth will the present infrastructure cope with such a vast development of housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1364  Respondent: 15355361 / Jennifer Brockless  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The proposed minimum of 400 houses to be built, coupled with the sites for "Travelling Show People" (why do they need permanent sites if they are "Travelling"?), and storage, is a development far too large for the area. The houses will be on Green Belt Land and result in a huge conurbation when coupled with the proposed development of Wisley Airfield. The roads in this area are already greatly overcrowded, with often poor air quality as a result. It will also involve the destruction of woodland full of glorious oaks which are a haven for wildlife.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### Comment ID: pslp171/3497  Respondent: 15355361 / Jennifer Brockless  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy E2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

4.4.23a A potential site for a Waste Management Facility is mentioned (tucked away in the hope that it will not be noticed?).

It is hardly a sensible option to plan to build so many houses and then put a Waste Disposal Site so close. With even the best of intentions these sites smell (especially in hot weather and with global warming happening, we are promised more heat) and to place them in residential areas is not reasoned. It would also be within 'striking distance' of the RHS Wisley - a world renowned enterprise - which would be highly sensitive to any malfunction of a waste disposal unit.

It is not worth the risk of the possible damage to people's physical and mental health to use this site.

It seems that far from taking into consideration the responses of the communities to the original local plan you have perversely altered the plan to build even more housing and industrial development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

### Comment ID: PSLPS16/1920  Respondent: 15355457 / M.D. Kimber  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

We object to Guildford Borough Council’s draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

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- Add to Guildford’s pollution

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

### Comment ID: PSLPS16/1923  Respondent: 15355553 / Susan Harris  Agent:

| Page 1932 of 2804 | 1932 |
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have lived in Hatchford since my marriage in 1959. I wish to add my name to list of objections who state that Allocation A35 Former Wisley Airfield be removed from the local plan.

I object to more houses being built on this site now named three farms meadow. The narrow winding lanes are not suitable for an increase of vehicles. It is too dangerous now for me to walk 200yards to post a letter at the Black Swan public house post box. I have to drive for my own safety.

I object to more traffic causing the air quality to further break the EU permitted levels.

I object to loss of Green Belt land. My husband and I are great nature lovers and walk through the woods almost daily on public rights of way!

I object to Guildford Borough Council proposed local plan (June 2016) and to continued inclusion in the plan of the former Wisley Airfield now know as Three Farm Meadows.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1922  Respondent: 15355585 / Wendy Grimmond  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/142  Respondent: 15355585 / Wendy Grimmond  Agent:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1925  Respondent: 15355617 / Terry Lane  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

We object to Guildford Borough Council’s draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- Destroy view from the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat running through local roads
- Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1926  Respondent: 15355969 / Valerie Drummond  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
We object to Guildford Borough Council’s draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- Destroy view from the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat running through local roads
- Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<tr>
<th>Comment ID: PSLPP16/4133</th>
<th>Respondent: 15356321 / Mark Aljoe</th>
<th>Agent:</th>
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<tr>
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Pleased to confirm that I approve the proposed retention of allotments in N Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/4136</th>
<th>Respondent: 15356353 / Pam Patrick</th>
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I would like to object in the strongest possible terms to the proposed increase in the number of dwellings in the Horsley area. The schools are already full. It is almost impossible to get a Doctor’s appointment without a week or two’s delay. It is difficult to park for the shops and the volumes of traffic are already equivalent to that of a busy town rather than 2 villages. Please reconsider!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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3). Our schools are full.

4) It is difficult to get an appointment with our doctors, they are always so extremely busy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<th>Comment ID: PSLPP16/4135</th>
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2). We are already overloaded with cars, it is difficult to park for shopping in Station Parade and our roads are much too narrow for the large lorries which are even now encountered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I write in connection with the proposed new Guildford Local Plan. My objections are as follows:

1). There is no 'special' reason to remove the Horsleys from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

5) To suggest building another 593 houses in the Horsley area, plus 2000 at Wisley is quite ridiculous and I OBJECT VERY STRONGLY INDEED - WE WILL BE OVERWHELMED.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1117  Respondent: 15356385 / Mervyn Plumtree  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of immediate provision for new schools.

I object to the lack of any immediate provision for doctors surgeries.

I object to the local plan as the development proposed is not sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1932  Respondent: 15356385 / Mervyn Plumtree  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to site A25 Gosden Hill Farm- massive over development of 2000 homes in the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPS16/1933</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object to site A35 Wisley Airfield- 2000 homes that are totally inappropriate and unsustainable development in the green belt.</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object to the late inclusion of site A43 Garlicks Arch.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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</table>
I object to site A43a the on and off ramp at Burnt Common/Clandon - this will increase traffic problems in the villages, not help them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1934  Respondent: 15356385 / Mervyn Plumtree  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to site A45 The Talbot - this is over development in a conservation area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4138  Respondent: 15356385 / Mervyn Plumtree  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to all erosion of the green belt and any sites for development included in the local plan will only give the developers a wedge to continue their fight to erode our green and pleasant land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/4140</th>
<th>Respondent: 15356385 / Mervyn Plumtree</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to the removal of any villages from the green belt as this would lead to unsuitable development and the destruction of the integrity of our villages.</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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<tr>
<td>I object to the disproportionate amount of development in one area of the borough.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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Comment ID: SQLP16/759  Respondent: 15356385 / Mervyn Plumtree  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the last minute inclusion of new sites with less than 2 weeks notice.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/760  Respondent: 15356385 / Mervyn Plumtree  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the limited consultation period.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1118  Respondent: 15356449 / Chris Gardner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Effingham

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing in reference to the local plan for housing development in Effingham and in particular to the revision of its settlement/ inset boundary as detailed on page 338 of the local plan.

I am objecting to the revision of the inset boundary to include those areas marked in yellow.

In particular :-
1. The amenity land at rear of Middle Farm Place is designated open space and there is no need to include it in the settlement as this increases the 'crawl' of the village westwards. It is also an important part of the Middle Farm Place children’s recreational area and is constantly used for ball games etc.

2. The land immediately behind the houses in Middle Farm Close has no access and is part of the conservation area and is adjacent to farm land.

4/5. The inclusion of this land enables the urban ‘crawl’ westwards as stated above. Regarding the proposed allocation of the Barn (no 4) for housing, this is a barn of historic interest and from an access feasibility point of view can only accommodate a max of 5-7 residences. Any site allocation for such purpose should reflect a proper feasibility assessment on highway grounds.

In terms of land which could be accommodated within the settlement which at present are not, are the lands shown edged blue. These lands are in the main already developed and are intrinsic to the village configuration, particularly St Lawrence school and the Red House and British Legion. The only potential issue is the vacant land known as Lyons Field adjacent to the school, which is a natural extension to the village boundary and is arguably infill in any event, being bordered on 3 sides by development and on the other by the school playing fields.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1941  Respondent: 15356513 / Anthony Gatford  Agent: Tony Gatford

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4. I OBJECT to building 45 houses at Clockbarn Nursery, due to inadequate access and traffic volumes. The junction with Send Road is already very hazardous for vehicles trying to join the main road. Planning permission has already been given for 64 apartments further along Tannery lane which will generate additional heavy traffic. This new additional housing would compound an already dangerous situation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1939  Respondent: 15356513 / Anthony Gatford  Agent: Tony Gatford

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Page 1943 of 2804
2. I OBJECT to building 400 houses and 7000 sq metres of Industrial space at Garlick's Arch, Opposite Send Marsh Road. This is an area of Ancient woodland and very prone to flooding indeed recently over half a million pounds was spent downstream of this location to prevent flooding to houses in Maples Road and surrounding area's. The Industrial space is not needed but could however already be accommodated at Slyfield Park in nearby Guildford. Guildford Boroughs housing requirements have been shown to be grossly over exaggerated, and they refuse to disclose what formula they use to arrive at their calculated requirements. Proper use of Brownfield sites within the Borough should eliminate the need to encroach on such a Green Belt area!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1940  Respondent: 15356513 / Anthony Gatford  Agent: Tony Gatford

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3. I OBJECT to a new interchange with the A3 at Burnt Common, because Send would have to try and then cope with traffic from the proposed 2000 new houses at Wisley Airfield, 2000 houses at Gosden Hill, Burpham and 1830 at Blackwell Farm. Traffic on this section of the A3 is already at a standstill during rush hour periods, and all such additional traffic would then flow through Send road which is already overloaded. This must be avoided.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1942  Respondent: 15356513 / Anthony Gatford  Agent: Tony Gatford

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
5. I OBJECT to the development of 40 houses and 2 travelers pitches at Send Hill. It is an inappropriate location, which would be serviced by a narrow single access Country road. Subsoil at the proposed site contains unsafe landfill waste as registered with GBC.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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1. I OBJECT to Send Village being removed from the Green Belt.

The green Belt was intended to be permanent, per the National Planning Policy Framework and I believe there are no special circumstances to justify abandoning it. Send's Green Belt is an essential buffer between Guildford & Woking stopping it becoming one Urban Mass! Central Government & Local Councillors made a clear election promise to protect the Green Belt and this Plan reneges on the promise given to the electorate. Developers would be quick to seize upon such an opportunity and there would be no policy in place to stop them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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1. GBC HAVE NOT FOLLOWED CORRECT PROCESS WITH THIS LATEST PLAN.

Since 2014 GBC has changed every major site in Send proposed for development, (now standing at some 485 houses and a massive new road junction). These very significant changes should require another full consultation under regulation 18, not a shortcut of Regulation 19 which GBC are attempting to get away with. This undoubtedly invalidates the whole Local Plan Process!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
4) I object to the proposal to Inset Send Business Park from Green Belt because: There is extremely restricted vehicular access along Tannery Lane in both directions. Further development at this location would detract from the openness of the Green Belt and is totally inappropriate and uncalled for.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the Policy A42 change at Clockbarin Tannery Lane because: It ignores all previous objections by residents, and is a 33% increase in homes over and above the original ill conceived plan. Which would exacerbate existing traffic and flooding issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
2) I object to Policy A43 change at Garlick's Arch because: It ignores the thousands of previous objections made by local people. It will cause extensive over development of our village and the number of homes is excessive. It will generate more traffic which will not only block up the local roads of Send and Ripley, but also the major P3 trunk road into Guildford which already struggles to cope with current traffic levels during rush hour periods. It is also a flood zone 2 allocated area, and subject to frequent flooding. There is also no proven demand for Travelling Show-people plots in this location.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2693  Respondent: 15356513 / Anthony Gatford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3) I object to Policy A58 at Burnt Common because:
It was deleted from the 2014 draft because of previous objections. There is no proven reason to have more industrial and Warehouse development in the middle of the Green Belt, when Slyfield and Guildford still have empty sites and industrial units. This amounts to a huge over allocation of industrial land, in the middle of the Green Belt, given the current decline in demand for such industrial premises within the Guildford area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4167  Respondent: 15356577 / Jeremy R. Miles  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write in respect of the above and in defence of the Green Belt, a policy which has served us well over the past 50 or so years. Preserving the green lung around our metropolitan areas and the character and equilibrium of the villages in which we live.

Whilst I appreciate the need for more housing, I would direct you towards the many brown field site which exist where development opportunities are available without encroaching into large areas within the confines of our villages which are currently green and unspoilt creating the ambience in which we choose to make our homes.
In particular I would like to draw your attentions to the designated areas within the parishes of east and west Horsley, development of which would overwhelm the two places we all so enjoy and which would bring an unbelievable burden upon the services and residences existing at the present time.

In the event of development being permitted I foresee two outcomes, the pressure from existing services and infrastructure will bring with it the lead for further urbanisation and that land sold for redevelopment will be for the profit of the buyers who will erect five bedroom three bathroom houses rather than the smaller dwelling for which there is an undeniable need.

I feel that the array of notice boards which are being erected in the Horsley’s Dondens and Ripley more than endorse the view that changes to the status quo are unwelcome

I urge you to resist the pressures from central Government and preserve the integrity of the Green Belt for the benefit of future generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/4148  Respondent: 15356705 / Sandra Madgwick  Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

One of the very serious issues it that of utilities of all kinds, but most notable in the area is that of drainage. This has been well documented over many years, including houses in New Inn Lane having raw sewage in their gardens, and the ‘run off’ from another 2,000 homes on Gosden Hill doesn’t bear thinking about. The schools, health services and community support systems will need to be doubled, so how will this be funded? We cannot afford the extra funding, and in spite of promises of improvements by past developers, nothing has been forthcoming.

I therefore register my official objection.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/4147  Respondent: 15356705 / Sandra Madgwick  Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am writing to register my dismay and objection to the re-hashed and poorly compiled report known as ‘the Guildford Local Plan’…which is presented in the manner that Chilcot would be proud of - wordy, far too long, unclear and ambiguous and appalling font and colours which render it impossible to read - should anyone have the time - for people with vision impairment.

I have many concerns and comments, however, will confine them to the main issues. I am confused as to why the issue of the already congested road network around the area - especially affecting Burpham - has not been addressed. I have it on good authority that the SHAR is unfinished! Surely you cannot even remotely consider attempting to cram in another 1,500 or 2,000 houses in the area until you have a sustainable infrastructure. This encompasses many things, but as at times the roads around Burpham are already almost gridlocked on a daily basis, you will add what amounts to another 3,000+ cars all trying to get through Guildford via Burpham. The pollution caused by this will take the air quality down even further as cars ‘idle’ on the roads. No further comment is needed about the road surfaces around here - they are notorious and known as some of the worst in the South east.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/763  Respondent: 15356705 / Sandra Madgwick  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Just how accurate are your SHMA figures and was the person/people responsible for the figures adequately briefed or qualified to declare these? Only 4 years ago, the number of houses needed was put at 322 per year, even then this figure was disputed, however, comments and objections were never addressed and fortunately this was not carried through. So here we are, 4 years on and the figure has soared to around 693 per year in Burpham alone. What justification can you make for this dramatic and frankly terrifying number which will double the size of the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4150  Respondent: 15356769 / Jennifer Galloway  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
2 The infrastructure such as roads, water & sewage & schools to name three seem to be planned for after the building of houses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4151  Respondent: 15356769 / Jennifer Galloway  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3 The congestion in Burpham leading up to the A3 junctions will be extreme and needs to be dealt with before so many houses are built increasing the number of cars using the roads by at least double.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4152  Respondent: 15356769 / Jennifer Galloway  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4 It is part of the green belt. A conurbation such as Guildford can ill afford to loose any part of the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4149  Respondent: 15356769 / Jennifer Galloway  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
I object to the plan for the Gosden Hill development

1. The number of houses planned far exceeds the number suggested 4 years ago.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1120  Respondent: 15356801 / Clare Harlow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

17. I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1121  Respondent: 15356801 / Clare Harlow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I OBJECT to the Strategic Housing Market Assessment (SHMA) figure of 693 houses per annum in the borough being too high (Appendix D)

- The "objectively assessed need" figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
- failure to correct for errors in the historical data for international migration flows,
- issues with the way it considers students and affordability and
- flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1950  Respondent: 15356801 / Clare Harlow  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

14. I OBJECT to Gosden Hill development being in the Local Plan. The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from
encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/1951  **Respondent:** 15356801 / Clare Harlow  **Agent:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

14. I OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

16. I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4161  Respondent: 15356801 / Clare Harlow  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

8. I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4158  Respondent: 15356801 / Clare Harlow  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
5. I OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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6. I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

7. I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4172  Respondent: 15356801 / Clare Harlow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in pri An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in...
London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

3. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4168  Respondent: 15356801 / Clare Harlow  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

13. I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4171  Respondent: 15356801 / Clare Harlow  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

19. POLICY H3 – Rural Exception Homes

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4162  Respondent: 15356801 / Clare Harlow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

9. I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and
with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

10. I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>PSLPP16/4165</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

12. I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID:</th>
<th>PSLPP16/4156</th>
<th>Respondent:</th>
<th>15356801 / Clare Harlow</th>
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<tr>
<td>Document:</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3. I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and
the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4157  Respondent: 15356801 / Clare Harlow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4. I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4153  Respondent: 15356801 / Clare Harlow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan.

1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1) The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4155  Respondent: 15356801 / Clare Harlow  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2.

I OBJECT to the Borough Wide Strategy (Policy S2)

a. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensibl This approach differs from all the other Borough Councils in Surrey.
b. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

c. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
4. I OBJECT to building 45 houses at Clockbarn Nursery, due to inadequate access and traffic volumes. The junction with Send Road is already very hazardous for vehicles trying to join the main road. Planning permission has already been given for 64 apartments further along Tannery lane which will generate additional heavy traffic. This new additional housing would compound an already dangerous situation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1946  Respondent: 15356833 / Carolyn Gatford  Agent: Tony Gatford
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2. I OBJECT to building 400 houses and 7000 sq metres of Industrial space at Garlick's Arch, Opposite Send Marsh Road. This is an area of Ancient woodland and very prone to flooding indeed recently over half a million pounds was spent downstream of this location to prevent flooding to houses in Maples Road and surrounding area's. The Industrial space is not needed but could however already be accommodated at Slyfield Park in nearby Guildford. Guildford Boroughs housing requirements have been shown to be grossly over exaggerated, and they refuse to disclose what formula they use to arrive at their calculated requirements. Proper use of Brownfield sites within the Borough should eliminate the need to encroach on such a Green Belt area!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1947  Respondent: 15356833 / Carolyn Gatford  Agent: Tony Gatford
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3. I OBJECT to a new interchange with the A3 at Burnt Common, because Send would have to try and then cope with traffic from the proposed 2000 new houses at Wisley Airfield, 2000 houses at Gosden Hill, Burpham and 1830 at Blackwell Farm. Traffic on this section of the A3 is already at a standstill during rush hour periods, and all such additional traffic would then flow through Send road which is already overloaded. This must be avoided.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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5. I OBJECT to the development of 40 houses and 2 travelers pitches at Send Hill. It is an inappropriate location, which would be serviced by a narrow single access Country road. Subsoil at the proposed site contains unsafe landfill waste as registered with GBC.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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1. I OBJECT to Send Village being removed from the Green Belt.

The green Belt was intended to be permanent, per the National Planning Policy Framework and I believe there are no special circumstances to justify abandoning It. Send's Green Belt is an essential buffer between Guildford & Woking stopping it becoming one Urban Mass! Central Government & Local Councillors made a clear election promise to protect the Green Belt and this Plan renegades on the promise given to the electorate. Developers would be quick to seize upon such an opportunity and there would be no policy in place to stop them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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1. GBC HAVE NOT FOLLOWED CORRECT PROCESS WITH THIS LATEST PLAN.

Since 2014 GBC has changed every major site in Send proposed for development, (now standing at some 485 houses and a massive new road junction). These very significant changes should require another full consultation under regulation 18, not a shortcut of Regulation 19 which GBC are attempting to get away with. This undoubtedly invalidates the whole Local Plan Process!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp173/357  Respondent: 15356833 / Carolyn Gatford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4) I object to the proposal to Inset Send Business Park from Green Belt because:
There is extremely restricted vehicular access along Tannery Lane in both directions. Further development at this location would detract from the openness of the Green Belt and is totally inappropriate and uncalled for.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/2695  Respondent: 15356833 / Carolyn Gatford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1) I object to the Policy A42 change at Clockbar4 in Tannery Lane because: It ignores all previous objections by residents, and is a 33% increase in homes over and above the original ill conceived plan. Which would exacerbate existing traffic and flooding issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/2696  Respondent: 15356833 / Carolyn Gatford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2) I object to Policy A43 change at Garlick’s Arch because:
It ignores the thousands of previous objections made by local people. It will cause extensive over development of our village and the number of homes is excessive. It will generate more traffic which will not only block up the local roads of Send and Ripley, but also the major A3 trunk road into Guildford which already struggles to cope with current traffic levels during rush hour periods. It is also a flood zone 2 allocated area, and subject to frequent flooding. There is also no proven demand for Travelling Show-people plots in this location.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2697  Respondent: 15356833 / Carolyn Gatford  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A58 at Burnt Common because:
It was deleted from the 2014 draft because of previous objections. There is no proven reason to have more industrial and Warehouse development in the middle of the Green Belt, when Slyfleld and Guildford still have empty sites and industrial units. This amounts to a huge over allocation of industrial land, in the middle of the Green Belt, given the current decline in demand for such industrial premises within the Guildford area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4169  Respondent: 15356929 / Julie Simmonds  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I strongly object to the Guildford Local Plan 2016 to:

1. remove "inset" the neighbouring villages of Ripley, Send, Clandon and the Horsleys out of the Green Belt which will facilitate their merger into one another and inevitably lead to the creation of an unrestricted sprawl of large built-up areas;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4178  Respondent: 15357025 / Emma Willis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to lodge my objection to the proposed new Local Plan that removes Green Belt protection from Chilworth village. The NPPF places great weight on the protection of Green Belt and states that Green Belt boundaries should only be altered in exceptional circumstances. The need for housing is not considered exceptional and I believe Chilworth village contributes greatly to the openness and character of the countryside that the Green Belt is meant to protect for future generations.

The village undeniably adds to the open character of the countryside in topography and views. It is bounded on side by the Tillingbourne river and the historic Gunpowder Mills in the Tillingborne Valley with steep part wooded slopes up to St Martha's church; which is a prominent landmark and backdrop for the village. The village itself represents a modest and narrow strip of development that is bounded on the other side by the railway.

Further infill development would encroach on the north towards the steeply rising slopes of St Martha's with the historic medieval church of St Marthas and to the South the ecological conservation area of Blackheath.

Surely, the status affords Chilworth some recognition of the historic and current value to the Green Belt. The area surrounding Chilworth is in the Area of Outstanding Natural Beauty and therefore is of national landscape importance - indeed the link with historic industry means that the Area of Great Landscape Value recognises the area of County importance. The Chilworth conservation area has large area of open space which contributes to a soft, rural feel complemented by a backdrop of semi-wooded steep hillsides. Indeed, the removal of Green Belt status threatens the character and feel of the area from overspill and infill development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4179  Respondent: 15357057 / Keith Willis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46</td>
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**OBJECTION** to A46 Normandy & Flexford’s strategic site plan.

The plan to put 1100 new homes and a school for 1500 pupils is going to have a massive effect on the area. This is a huge development on Green Belt land that will dramatically change the area.

The roads in this area barely cope with the level of traffic at the moment. Clearly 1100 new homes is going to dramatically worsen the situation and then to throw in a 1200 pupil & 300 staff school, most of whom will be coming from outside of Normandy is just madness.

Any idea that large numbers of pupils are going to cycle or walk to school along these overcrowded & narrow roads simply isn't going to happen, also the idea that hundreds of people are going to go to school via Wanborough Station, I find risible. What is likely happen is what happens everywhere else, the kids will get driven to school. This will add hundreds of car journeys into the area twice a day. The whole area is just going to be gridlocked.

The increase in traffic is bound to increase pollution, especially as so much of it will end up at a snails pace, at which point cars are their most polluting.

I object to the effect on wildlife much of which is in sharp decline. I fear the proposed Sangs are in areas prone to flooding and in the winter will push walkers and others on to Ash Ranges which has SSSI status, and the increase in users can only have a detrimental effect on vegetation and wildlife.

I object to the nature of the development and feel it should be in keeping with the existing housing.
I feel strongly that the burden of new homes should be spread more evenly throughout the UK and not heavily in southeast and not in large developments, however lucrative and convenient for builders.

Lastly and not least the vote to leave the EU has sent a clear message that the country does not want mass immigration, thus putting the whole need for such a review in doubt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1846  Respondent: 15357089 / Robert Gray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to changes to policy P2 for the following reasons

The statement that the metropolitan green belt will be protected against inappropriate development should be changed to the metropolitan green belt will be protected. The words inappropriate development are clearly designed as the thin end of the wedge to allow development that once started will continue and expand.

The green belt is designed to protect against unrestricted development and prevent towns and villages merging into each other and should be protected at all costs.

I object to the insetting of 15 villages an infilling of the green belt villages as this is another ploy in allowing development in the green belt.

I object to the Traveller site at Palm House Nurseries and Show–People site at Whittles Drive being made permanent an inset from the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1954  Respondent: 15357121 / A. Turner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s draft Local Plan proposals to build 1800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- Destroy views form the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat-running through local roads
- Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1955  Respondent: 15357217 / Camilla Cressy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I'm writing to Object profusely about the proposed building plans in and around Send and Ripley.

I'm horrified to learn that you may be removing send village from the green belt and introducing 400 new homes at Garlicks Arch, plus 40 homes in send hill and travellers pitches! I object to all of these changes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4204  Respondent: 15357217 / Camilla Cressy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Drs surgery is already impossible to get appointments at so more people living in the area would cause a massive strain on that.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>The traffic in Send is already unbearable during the busy periods in the morning, we are constantly congested on Send Barnes lane and I cannot imagine how difficult it would be with more vehicles on the road.</td>
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<td>I object to all the plans proposed and am at a loss to understand your willingness to consider send at all with all the congestion and traffic gridlock we have already.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>The areas of beauty on send hill are where we regularly walk our dogs, the travellers sites and homes would completely ruin that area for all of the community who use it daily for walking.</td>
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Comment ID: PSLPP16/4206  Respondent: 15357249 / Seon Jeong  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As a resident in Guildford area for the last 13 years, I mainly welcome the plan of developing new affordable houses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4208  Respondent: 15357249 / Seon Jeong  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly believe that any development plan should go hand in hand with other social infrastructure, hence if you plan to build more houses, people also need roads to get access, schools, shops, etc. alongside them.

Thank you very much for your attention and I hope you make a wise and sensible decision about the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4207  Respondent: 15357249 / Seon Jeong  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

However, prior to this development plan carried out, we definitely and urgently need new roads and transport system to accommodate this future expansion of the area. I've already felt that roads in Guildford get busier and less efficient, and I'm very much concerned about more traffic jams not only during peak times but also anytime and everywhere in Guildford once the housing development in the planned areas are in the full swing and in complete.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1959  Respondent: 15357313 / Dawn Adams  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s draft Local Plan proposals to build 1800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- Destroy views form the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat-running through local roads
- Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1961  Respondent: 15357441 / Richard Hunt  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to 400 houses and 7000 sq metres of industrial space at Garlick’s Arch. When I first heard this I thought it was a mistake. It’s a whole new village in one go. Has anybody there been here in rush hour? The industrial space should belong at Slyfield if we ever needed any more.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1962  Respondent: 15357441 / Richard Hunt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to a new interchange with the A3 at Burnt Common. This would be the end of the three villages as we know it. The interchange would make a cut through from Wisley Aitfield (2000 houses) and the 400 houses at Burnt Common making Ripley and Send into a town traffic congestion area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4212  Respondent: 15357441 / Richard Hunt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to houses being built on Clockbarn Nursery and Send Hill. Both areas have small country roads and are already busy enough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4211  Respondent: 15357441 / Richard Hunt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to our village Send being removed from the Green Belt. The Green Belt is there for a reason. Local Councillors and central Government gave a clear election promise to protect the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1963  Respondent: 15357473 / Lynne Turner  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s draft Local Plan proposals to build 1800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

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• Increase tailbacks on the A31 and traffic congestion
• Result in rat-running through local roads
• Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/964  Respondent: 15357473 / Lynne Turner  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I am writing TO OBJECT to this proposal most strongly. There are so many reasons why this is totally inappropriate and a very bad decision, I will try and summarise my objections as follows:

- This proposal was added to the plan at the last minute it seems, and it is not properly thought through as I will demonstrate below – it comes across as suiting the wishes of the development company to make huge profits at the expense of the local community, and suiting GBC who would complete a large part of their obligations with one single development – again at the expense of the existing community and village
- It is totally reckless to destroy a village and local community with such a large disproportionate development – I totally understand the need for new housing and would welcome a smaller development – were this to be distributed across GBC fairly and proportionately
- GBC have not demonstrated the exceptional circumstances required to justify the release of this land – red sensitivity - from the Green Belt – no school is needed and if it were it does not have to be built on the Green Belt. Rokers are offering the potential for a school and development in a far more accessible area with better roads.
- A school is not needed in this area – there are very few children in the village, and a number of schools in the area which are currently undersubscribed – and were this situation to change could easily expand to take in further pupils which would be far less costly than building a new school from scratch. It seems that the need for a school has been invented to provide a convenient reason to destroy a large part of the green belt – which this present council during last year’s elections vowed to protect -what hypocrisy.
- So the school justifies the housing estate which justifies the school ………… you are creating the need which didn’t exist previously…….. Unfair on the local community, great for the developers and their pockets
- Our roads are already congested at peak times, and whenever anything goes wrong on other local roads, and busy the rest of the time. Adding in the traffic that would come with a further 1100 houses would bring the area to a standstill. I can’t see how there is any capacity to develop Westwood Lane or Glaziers Lane or Wanborough Hill – all country lanes which already struggle with the amount of cars on the road through the village – given the restrictions of existing houses and the railway bridges. The A323 similarly gets extremely congested. While
there is a station, the reality is that most people use cars to travel locally. South West trains are notoriously unreliable. An additional 1000 to 2000 cars on the road daily will bring us to a complete halt.

- It is already difficult to get a fast appointment at the doctors surgery – I can’t see that there would be capacity for this many further people.
- The impact on local wildlife would be devastating – why not look at brownfield sites – surely the green belt should only be looked at when there are no further brownfield sites available, and then in a proportionate manner?
- Concreting over so much land would be likely to worsen the flood risk in the area
- Our drainage systems are already very poor. We have called out Thames Water around ten times recently, as we are constantly getting sewage come up in our garden. What would be the impact of so many new homes on the current drainage system?
- There would be an adverse impact on the health and wellbeing of existing local residents – our needs are being callously swept aside – for profit and convenience

There has to be a better way, proportionate and reasonable development across the whole borough, focussing on brownfield sites and existing school resources. Please drop the proposal for A46 immediately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the late inclusion of the Garlick's Arch site A43 opposite the Send Marsh Road. This is a Green Belt site with ancient woodland and is prone to flooding. The planned 7000 sq metres of industrial site is not suitable and if required should be sited at Slyfield where there is already adequate space for such warehousing. Also the requirement of 400 houses on this site is based on dubious calculations which Guildford Council have refused to disclose. With proper use of Brownfield sites in and around Guildford, this Green Belt site is not needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1968  Respondent: 15357697 / Ros Reeves  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

I object to the planned new interchange with the A3 at Burnt Common as this would make the already crowded local roads completely gridlocked. Together with the proposed 2000 houses at Wisley Airfield, the 2000 houses at Gosden Hill Burpham and 1850 at Blackwell Farm, as well as the 400 proposed for Garlick's Arch, all traffic would have to travel through Send Village and local roads which are already overloaded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1969  Respondent: 15357697 / Ros Reeves  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the proposed development of 40 houses and 2 travellers pitches at Send Hill. The narrow width single access country road provides insufficient access. Also the site contains unsafe landfill waste registered with Guildford Borough Council.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/4217  **Respondent:** 15357697 / Ros Reeves  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I am writing to object most strongly to the latest 2016 Local Plan as it is not sustainable. The plan involves more houses, more industrial buildings, more lorries, more traffic congestion, more pressure on medical surgeries and more pressure on school places as well as open spaces being a thing of the past.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/4221  **Respondent:** 15357697 / Ros Reeves  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to Send Village being removed from the Green Belt. The Green Belt was instended to be permanent as required by the National Planning Policy Framework and there are no special circumstances for abandoning it. Local councillors and central Government gave a clear election promised to protect the Green Belt and this should be upheld.

I object to the disproportionate amount of planned development in this area and the Council's complete lack of consideration for local residents whose lives will be severely affected by the mahem which will be caused by these large scale developments.

I feel that Send, Ripley and Send Marsh must be protected from the vast amount of development planned on Green Belt land and the health and welfare of existing residents should be considered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s draft Local Plan proposals to build 1800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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- Result in rat-running through local roads
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Safety

The increased congestion and low speed cars for prolonged periods throughout the day will lead to very high levels of pollution in the local area. I am very concerned for my two young sons heath due to the proposed development at Gosden Hill Farm. From Winterhill Way there is no safe crossing point across this A3100 which is required to reach Burpham Sainsburys or Burpham Primary School. This is already a busy road and the proposed development will add 5,000+ additional cars to this section. I am concerned about the safety implications to my two young sons due to the proposed development at Gosden Hill Farm.

Infrastructure

The proposed development at Gosden Hill Farm will add significant strain on the local infrastructure. The sewage, water and power networks are currently strained for the local population and therefore significant improvements are required to be implemented before even considering building any more houses in the local area. There is not sufficient details in the local plan regarding essential infrastructure improvements and as such the Local Plan should be considered unsound.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Education**

I have two young sons, my eldest is 3 years old and we hope that he manages to get a place at Burpham Foundation Primary School for the 2017 intake and then on to the George Abbott when he is 11. Schools in the local area are heavily oversubscribed and adding 2,000 homes to the local area will obviously make the situation much worse. There is insufficient details about schooling and who will be providing additional school places for the Gosden Hill Farm development, as such the Local Plan should be considered unsound. I am very concerned that my children’s education will suffer due to this unnecessary development at Gosden Hill Farm.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Transport**

The road transport network is currently not fit for purpose. I am stuck in traffic every evening for a significant time trying to complete my journey home, this is mainly due to heavy congestion on the A3 and poor connection to / from the A3 in the Burpham area. The current road network needs to be upgraded to be suitable for the existing population before considering adding 5,000+ additional cars to the local roads that would be caused by the new homes, industry and park & ride proposed at Gosden Hill Farm. I understand that a tunnel under Guildford is being considered underneath the 50 mph section of the A3, the proposed location at Gosden Hill Farm would be the most sensible entry point for this tunnel so it is very short sighted to develop this land for houses. Improvements to the A3 like the proposed tunnel under Guildford are required to be implemented before even considering building any more houses in the local area. The A3100 London Road is the intended entry point to this new development at Gosden Hill Farm, this will become two way and all traffic heading
north on the A3 will be routed south down the A3100 to the Clay Lane slip road. This will lead to very heavy congestion around the Burpham roundabouts and all roads into Burpham. New Inn Lane and the A3100 are currently grid locked every evening due to rush-hour traffic, the development at Gosden Hill Farm will add 5,000+ more cars and cause significantly more inconvenience to everyone who uses these road systems. Improvements to the current road network in Burpham are required to be implemented before even considering building more houses in the local area. As a minimum any new development would need to include a 4 way A3 interchange north of Burpham around Potters Lane, this should be included as part of the future tunnel project. The Strategic Highway Assessment Report (SHAR) and Sustainable Movement Corridor (SMC) do not take account of the current narrow road limitations, pinch points or include adequate information regarding congestion and as such the Local Plan should be considered unsound. Congestion is clearly going to be very severe and make travel round Burpham impossible at certain times of day.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4223  Respondent: 15357761 / Ross Haimes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the 2016 Draft Local Plan,

I live on Winterhill Way in Burpham and am extremely concerned about the 2016 Draft Local Plan. In particular the proposed development of Gosden Hill Farm to build 2,000 homes and allocate multiple pitches for Travellers.

Green Belt

My family decided to live in Burpham because we liked the character of the village, wanted to send our children to the local schools and live in an area surrounded by beautiful Green Belt countryside. The 2016 Draft Local Plan puts all of these qualities that made the area desirable to us at risk. In particular the loss of Green Belt, once Green Belt is built upon it will be lost forever. Green Belt should only be built upon in exceptional circumstances and the Local Plan does not provide sufficient evidence to justify developing Gosden Hill Farm and as such should be considered unsound. More consideration should be given to developing brownfield areas. It is very upsetting to think that our local Green Belt areas are at risk due to an ill thought through and unnecessary development that will ruin the character of the local area forever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4224  Respondent: 15357761 / Ross Haimes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
As per ONS Census Data, there were 5,221 people living in the Burpham area in 2001. Building 2,000 new homes on Gosden Hill Farm at the edge of the village will easily add an additional 5,000 people (assuming 2.5 people per home). This is clearly a disproportionate level of development in one area of the borough to the detriment of everyone currently living there, Burpham will double in size due to an ill thought through and unnecessary development. As mentioned in Housing Numbers above, this disproportionate level of development in Burpham has a high potential of leading to a property price collapse in the local area with significant negative economic consequences.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/772  Respondent: 15357761 / Ross Haimes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Housing Numbers

I do not agree with how Guildford Borough Council (GBC) have handled the Strategic Housing Market Assessment (SHMA). The SHMA method of calculating housing numbers is not clear and as such the Local Plan should be considered unsound, the number of houses proposed in the plan far exceeds what is required. GBC have simply taken the maximum projected number of houses by the SHMA without using common sense or rational judgement, I understand that other boroughs (e.g. Woking) are applying constraints to their overall housing growth and believe that Guildford should have a similar approach. The SHMA has been demonstrated to overestimate housing numbers in several areas, in particular the amount of new homes required to support job growth and students. Any population growth figures need to be revisited, especially following the vote for Great Britain to leave the European Union which is likely to significantly reduce external migration to the region. The building of houses far in excess of requirement has potential of leading to a property price collapse in the local area which will have long lasting negative economic consequences for all those who currently own homes there.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/773  Respondent: 15357761 / Ross Haimes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Consultation Period

I was shocked that a plan of this scale with such a devastating effect to the Green Belt, population, culture and infrastructure of the Burpham area is being rushed through with such a short consultation period. The plan was submitted in June and responses need to be received within 6 weeks by 18th July. This is a disgusting blatant attempt to steamroll the voice of the local population in order to get unnecessary additional houses built without due process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1971  Respondent: 15357793 / Mary Braybrode  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s draft Local Plan proposals to build 1800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

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- Increase tailbacks on the A31 and traffic congestion
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- Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1973  Respondent: 15357857 / S. Bradley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s draft Local Plan proposals to build 1800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- Destroy views form the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat-running through local roads
- Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1978  Respondent: 15357857 / S. Bradley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s draft Local Plan proposals to build 1800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

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- Increase tailbacks on the A31 and traffic congestion
- Result in rat-running through local roads
- Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4227  Respondent: 15357921 / Lisa Goldsworthy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am writing to register my objection to removal of the green belt protection from Chilworth and Shalford and Peasmarsh

This would allow the guildford area to become a sprawling suburban development and would not be good for the rural environment

This is some of the most scenic country and well farmed, productive and used land and allowing building would be foolish.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
As a resident of Send, I am writing to Object to the proposed Draft Local Plan.

I object to Send village being taken out of the Green Belt. This is because the Green Belt I understand was always intended to be permanent as required by the National Planning Policy Framework, and there are no special circumstances to justify abandoning it. Send's Green Belt provides a much needed buffer to prevent the village being swallowed up and becoming a suburb of Woking & Guildford.

I also object to the proposal to build 40 houses and 2 travellers pitches at Send Hill.

This location is entirely inappropriate since the only access road is very narrow, and also the subsoil of the proposed site contains well documented unsafe landfill waste that has to be regularly vented; this information is registered with GBC.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1980  Respondent: 15358049 / Peter Walls  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s draft Local Plan proposals to build 1800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

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- Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat-running through local roads
- Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/4231  Respondent: 15358081 / Geoffrey Waterton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
In a way this does not directly concern me since I live in Old Woking (Woking Borough Council, of course). However the billboards displayed throughout Send become increasingly alarming. Is there any really good reason for the opposition against the proposed development? Is there a shortage of land in the area - probably not? Yes it is part of a "green belt", but that can extend as far as you wish it to. Is there any good reason for this opposition except a dislike of change? As a well-intentioned member of the public I hope that the Borough Council will have very good reasons before they turn down this planning application.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1981  Respondent: 15358113 / Nicola Matthews  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s draft Local Plan proposals to build 1800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- Destroy views form the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat-running through local roads
- Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1982  Respondent: 15358145 / Simon Stevenson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to Guildford Borough Council's draft Local Plan proposal to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:-

- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution

In summary and to reiterate, I object to the above plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/1171</th>
<th>Respondent:</th>
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<th>Agent:</th>
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<tr>
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<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
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We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent:</th>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/1124  **Respondent:** 15358305 / Frances Hodgson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no schedule for Garlick’s Arch (A43), so the Plan takes no account of the infrastructure required for this site. It is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/1991  **Respondent:** 15358305 / Frances Hodgson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch is protected from development as Green Belt. There are no exceptional circumstances which allow for it’s removal from the Green Belt (Policy P2). Central Government state clearly that housing need is not an exceptional circumstance.
The Plan states the preference is to use of previously developed land, but GBC have removed a brownfield site at Burnt Common replaced it with Garlick’s Arch.

The site is not appropriate because:

• There is no sustainable transport infrastructure.
• The site is liable to frequent flooding
• The site has Ancient woodland and is a wildlife habitat, but no wildlife report for the site is in the Plan.
• There are no plans to improve local schools, medical or utilities to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

North facing ramps to the A3 at Burnt Common would be a disaster for local communities, which do need to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic. E.g. all traffic from London/M25 to Woking would go through Burnt Common, Send and Old Woking. This is not sustainable as this cannot be improved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4241  Respondent: 15358305 / Frances Hodgson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

The Garlick’s Arch (A43) proposal would double the built area in the locality, and would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4238  Respondent: 15358305 / Frances Hodgson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

There is too much traffic in our villages already and this plan will cause more congestion in Ripley, Send and Clandon, with no plan to improve that.

The rural roads in this area are narrow, in poor condition and have no footpaths. 5000 more houses means dangerous and unsustainable traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/4244  Respondent: 15358305 / Frances Hodgson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the lack of proper infrastructure planning for sites (Policy I1)

The Plan does not identify adequate infrastructure improvements to support the huge scale of development, especially at Garlick’s Arch (A43) which has no infrastructure projects in the Infrastructure Schedule to support it. Local services, utilities and sewerage, doctors etc. are at or close to capacity.

There are no plans to improve the capability of the medical and police/emergency services to cover the 5000+ houses in the north east of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4246  Respondent: 15358305 / Frances Hodgson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

The A3 or M25 would have to be improved before any development is done. Highways England has no plans to even start considering improving the A3 before 2020. Clearly no real improvements are possible in the timeframe of this Plan so the developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), should not take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to poor air quality concerns (Policy I3)

The huge developments being proposed, particularly in the north east of the borough will lead to considerable further congestion and to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1. I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick’s Arch (A43).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1. I object to not protecting the Green Belt (Policy P4)

I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick’s Arch (A43).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to development in areas which are at risk of flooding (Policy P4)

The Plan does not take adequate account of flood risk as required by National Planning Policy.

The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4236  Respondent: 15358305 / Frances Hodgson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2016).

These are my main reasons/ I object on these grounds / …

1. I object to the Local Plan as the development proposed is not sustainable (Policy S1)

13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve the infrastructure for Garlick's Arch.

The development should be in urban areas where there is sustainable transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4240  Respondent: 15358305 / Frances Hodgson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the Borough Wide Strategy (Policy S2)

GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

The Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing.

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/776  Respondent: 15358305 / Frances Hodgson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans.

But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1989  Respondent: 15358337 / David Langley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s draft Local Plan proposals to build 1800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- Destroy views form the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat-running through local roads
- Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/438  Respondent: 15358337 / David Langley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1992  Respondent: 15358369 / Jane Fallon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2001  Respondent: 15358433 / David Walters  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

We object to Guildford Borough Council’s draft Local Plan proposals to build 1800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

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- Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/1610  Respondent: 15358433 / David Walters  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

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- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2002  Respondent: 15358465 / Andrew Danks  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s draft Local Plan proposals to build 1800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

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- Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4267  Respondent: 15358497 / Liz Cooper-Mitchell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The density of the development will totally change everything the existing area is known and loved for.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4268  Respondent: 15358497 / Liz Cooper-Mitchell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

At present there is already very bad parking anywhere in Horsley village for visiting shopping areas, doctors surgeries and schools. The developments will change the whole character of the area and will no longer be the area which everyone has bought into and loved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4269  Respondent: 15358497 / Liz Cooper-Mitchell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In no way do I object to new housing in moderation on brown belt areas but what has been planned is totally wrong and unacceptable.

I ask most strongly for future generations that the Horsley villages remain in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4266  Respondent: 15358497 / Liz Cooper-Mitchell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
I would like to object very strongly to the proposed local plan for both East and West Horsley.

To increase the number of homes by 35% is totally unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

We object to Guildford Borough Council’s draft Local Plan proposals to build 1800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

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- Result in rat-running through local roads
- Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objections to Guildford borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the former Wisley Airfield FWA, now known as Three Farms Meadows TFM Allocation A 35 for the phased development of a new settlement of up to 2100 dwellings

I STRONGLY OBJECT to the draft Local Plan for the flowing reasons:

1. I object to 70% of new housing planned on green belt when there is ample brownfield in urban areas

1. I VERY STRONGLY OBJECT to the removal of the former Wisley Airfield site from the Greenbelt land the site is needed to protect against an urban corridor from London

1. I OBJECT STRONGLY to the disproportionate allocation in this part the borough .

The impact on the narrow roads around the villages of Ockham, Ripley, Wisley, Horsley and others will be detrimental to health due to heavy pollution levels from the A3/M 25 junction, light pollution and general impact of heavy traffic down narrow beautiful country lanes .

1. I STRONGLY OBJECT to A proposed development of over 2,000 houses would result in more than 4,000 cars, heavy lorries and buses for proposed schools, chaos at the station of Horsley and Effingham, impact on village life, cafes and public houses and local amenities.

Chaos at the Ripley roundabout.

1. I STRONGLY OBJECT ......My main concern, viewed with complete amazement and horror is the inclusion of the Wisley Air Field (three Farms Meadow) in the Local Plan I was at the meeting when EVERY COUNCILLOR to a MAN objected and refused permission!!!!!!

WHY therefore has it been included? Whose suggestion was that?

I need answers please.

All the authorities represented refused permission for the right reasons as the whole proposed development for the airfield is preposterous and the impact would be felt for years to come., To the detriment of all who live in the local area and the people yet to come .

Therefore in conclusion I demand that the Wisley Airfield is withdrawn from the local plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPS16/2005</th>
<th>Respondent:</th>
<th>15358593 / Martin Kemp</th>
<th>Agent:</th>
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<td>Document:</td>
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We object to Guildford Borough Council’s draft Local Plan proposals to build 1800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- Destroy views form the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat-running through local roads
- Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2006  Respondent: 15358625 / Ron Best  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object most strongly to the plan to build 400 houses and 7000 sq m of industrial spaces at Garlick's Arch. As well as threatening ancient woodland, this proposal destroys the green swathe of land which is all that separates Send Marsh (where I live) from the traffic and pollution of the A3. The implications of the infrastructure of roads and local services (the Medical Centre and schools for example) are unsupportable. 

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2007  Respondent: 15358625 / Ron Best  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object also to the proposed new interchange at Burnt Common which is a knock-on effect of the Garlick's Arch development. Anyone who watches the flow of traffic along Send Barns Lane and Send Marsh Road as things are at the moment will quickly realise that the additional traffic attracted to slip-roads for the new interchange will cause major traffic jams and pollution on our already overcrowded roads. During the rush hours (and the 'school run'), the result will be grid-lock.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Finally, I understand there is a proposal for 40 houses and two travellers' pitches at send Hill. Such a proposal will destroy a further area of open ground which affords pleasant views down towards the Wey. It is clearly not an appropriate site for this development, so I must object to that, too.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to this village (Send) being 'inset' and thus removed from the Green Belt. Green Belt is supposed to be in perpetuity, and in this case it provides an essential green zone which stops Woking and Guildford becoming a single conurbation unrelieved by open spaces. The removal of send from the Green Belt will inevitably destroy its character as a village with a healthy environment and good recreational amenities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the most recent draft Local Plan most strongly. I accept that people must have houses to live in and work opportunities, but the first version of the Plan which I saw included development of housing and infrastructure implications which were disproportionate to the size of our village. After two years of discussion and consultation, I welcomed the revised Plan which followed because it had significantly reduced these pressures, and seemed a much fairer distribution of the necessary development.

I was dismayed when I read that, at the 'eleventh hour', a further draft had been published which not only undoes the good that had been achieved with the earlier revision, but imposes an even greater burden on this area. My first objection is to the way in which this revision was slipped in so late in the day. Frankly, this smacks of sharp practice and raises questions about the integrity of the Council.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1069  Respondent: 15358625 / Ron Best  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A42 which increases the number of proposed homes from 45 to 60. The impact on traffic and other infrastructure in Tannery Lane and the A427 Junction will be even greater, as will the impact on the Green Belt. This is on top of the impact on the Green Belt of the Marina to be constructed further along TanneiyLane.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1070  Respondent: 15358625 / Ron Best  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to Policy A43 which adds 8 travelling showpeople patches to the Green swathe between Send Marsh and the A3 ('Garlick's Arch'). These cannot be in-keeping with the housing development proposed, and there is no known demand for this amenity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/1071  Respondent: 15358625 / Ron Best  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A58 which relates to development at Burnt Common which was deleted in 2014 because the objections made at the time were acknowledged. Its re-appearance in 2016 included up to 7000 sq m of industrial or warehousing use. This now appears as a minimum, which opens the way to further industrial development in the future. This will exacerbate all the negative impacts on infrastructure and the environment to which I have objected previously.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/129  Respondent: 15358625 / Ron Best  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy 2 at para 4.3.15 which will take the Send Business Park area (including the aforementioned marina site) out of the Green Belt altogether. This area of the Wey is a beautiful public amenity, the site is poorly served by a very narrow road, and this further incursion on the Green Belt will open up the possibility of further loss to an area of outstanding rural beauty. I trust my objections will receive your earnest consideration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2009  Respondent: 15358689 / C A Haworth  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s draft Local Plan proposals to build 1800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- Destroy views form the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat-running through local roads
- Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/2012  **Respondent:** 15358721 / Gill Haworth  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s draft Local Plan proposals to build 1800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- Destroy views form the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
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- Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/1127  **Respondent:** 15358753 / Adam Lewis  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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7. We object to the fact that GBC have not met the requirements of the NPPF Paragraph 155 which imposes an explicit obligation to have early and meaningful consultation. This has not been met in a number of areas by GBC. We have not had a meaningful consultation on imposing a settlement boundary on East Clandon, on the absence of meaningful economic and population growth figures for Guildford showing various scenarios with high, medium and low growth scenarios being offered.

We demand that there should be a significant challenge to the GBC scenario planning and the housing and growth numbers should be revised and especially in the light of uncertainty and change which will accompany Britain’s withdrawal from the EU.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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8. Policy D4: we object to the insetting of villages (meaning in fact, removal of villages from Green Belt protections) and the fact that they will be suffer from higher density development and the resulting increase in traffic, use of infrastructure which is already under pressure. We object in particular to the insetting of West Clandon, Send and the Horsleys. This will have a detrimental impact on Green Belt openness and the views in and out of the AONB in direct contravention of Policy P1 and P2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
5. We object to Policy S1 not offering sustainable development as regards roads and rail infrastructure which currently does not cope with demand, congestion on the A3 in particular, but also other A roads in the area such as the A247, the A246 and then there is the already overcrowded and slow train system for those already living in the borough and needing to commute to London. No pre-emptive planning has been made to alleviate these real problems which will be much exacerbated by large increases in housing.

We specifically want you to note the winding, narrow and dangerous route via the A247 through West Clandon which then drives people to use a cut-out with the even narrower rural road, the Ripley Road, through East Clandon to and from the A3. This will be much exacerbated with the large increase in housing twinned with large increase in cars and travel.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4281  Respondent: 15358753 / Adam Lewis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. We object to the Settlement Boundary which has been imposed on East Clandon without any consultation. This imposition provides no protection to further development outside of the settlement boundary (Policy P2 para 4.3.25) and is deemed by us as being unnecessary in an already tightly developed ancient and rural conservation village with high archaeological potential. We demand that this proposal be removed as it will endanger the openness of the Green Belt, the views in and out of the AONB (protection of the AONB Policy P1) and the character of our village.

2. Policy P2 – Green Belt: We object to this significant erosion of the Green Belt with the proposals for large towns being developed on Green Belt land thereby removing the openness of the Green Belt. We note in particular the huge developments proposed for the North East quadrant of the borough which will adversely affect our amenity, but also unfairly targets our tranquil rural villages because we can provide ‘dormitory’ facilities for commuters to London. These developments directly affecting our villages are the proposals for Wisley Airfield, Gosden Hill Farm, various farms and tracts in the Horsleys and Garlicks Arch at Send.

3. Further, on the erosion of Green Belt and we object that Policy P2 is not met where it states that Green Belt should be protected. We object to the disproportionate use of Green Belt land for housing – some 65% of the housing proposed is on Green Belt and with little consideration being given to redevelopment of brown field sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4286  Respondent: 15358753 / Adam Lewis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

9. We object that GBC are contravening the NPPF framework stipulation in paragraph 87 with the proposed developments at Gosden Hill Farm, Ripley, East and West Horsley and Garlicks Arch, Send. Paragraph 87 states “As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.” and GBC have not proven any special circumstance for developing on these Green Belt areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4284  Respondent: 15358753 / Adam Lewis  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

6. Continuing with Policy S1 (Presumption in favour of Sustainable Development) we object that this is not being met and that GBC are contravening this when it is clear that no fixed plans are available to improve the provision of shops, medical facilities, schools in our immediate area (besides roads and rail already mentioned) to service us. If the GBC were serious about improving the infrastructure and sustainability of our communities, they would have secured plans and funding to ensure these facilities are available and not just at the behest and hoped-for goodwill from the developers. Further, how will developers be held accountable to their promises to build infrastructure? Stories are legion of developers reneging on commitments as the ‘money runs out’ even though vast profits will be made from turning agricultural and Green Belt land into highly valuable housing land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4279  Respondent: 15358753 / Adam Lewis  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Objection to the Guildford 2016 Local Plan

East Clandon Parish Council objects to the 2016 Draft Local Plan as a whole and in particular we object to the specific issues (listed below). We believe that this deeply flawed Local Plan will have a direct and detrimental effect on the amenity currently enjoyed by residents of East Clandon and to the even greater detriment to our neighbouring villages of West Clandon, Ripley, West and East Horsley. It erodes the openness of the Green Belt and endangers the beauty and views in and out of the Surrey Hills AONB.

Our specific points are:

1. We object to Policy S2 for the proposed provision of the very high overall housing numbers of 13,800 new homes (690 new dwellings being built every year for 20 years) and we object on two grounds; these housing numbers have been imposed on us with no real consultation being undertaken with the residents of East Clandon and the borough as a whole. Secondly, the housing numbers are based on a high-growth economic development plan which in itself has had no consultation with us and this combined with estimated demand from London residents will turn Guildford into a dormitory town for London.

Further, we object to the fact that no real economic or housing demand factors have been provided by the borough planners to substantiate the very high housing target of 13,800 new dwellings over the next 20 years. This is in direct contravention of the NPPF’s requirement for the planning authority to provide meaningful consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2013  Respondent: 15358785 / Barbara Kent  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s draft Local Plan proposals to build 1800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- Destroy views form the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat-running through local roads
- Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2017  Respondent: 15358817 / Lin Rose  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
We object to Guildford Borough Council’s draft Local Plan proposals to build 1800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- Destroy views form the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat-running through local roads
- Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I wish to express my objections to the Guildford Borough Local Plans for the following reasons:

- I consider that the overall plan indicates considerable overdevelopment of the Normandy and Flexford areas, which will destroy the openness and rural environment, which currently
- I object to the proposed development of a minimum of 1200 houses within the boundaries of Strategic Site A46, which is all within Green Belt
- Building on Green belt land can only be considered if it can be shown that there are very special GBC have not demonstrated any special circumstances within the Local Plan as to why it is necessary to remove this land from the protection of the Green Belt, is therefore against National Policy for the Protection of the Green Belt, and strongly object to the proposals. The intended purpose of the Green Belt is to maintain areas of green fields and natural beauty of the green fields, which will be destroyed if Site A46 is allowed to be developed.
- The proposed development is within sight of the Hogs Back and the Surrey Hills which are allocated as Areas of outstanding Natural Beauty and as such would be detrimental to the openness and beauty of this area.
- There are many brown field sites that exist within the GBC area, which could be used to meet the housing needs, but the Local Plan does not demonstrate that these sites will be used to meet the demand of future housing
- Whilst may accept more houses are needed, if this site and is approved for development of 1200 homes, Normandy would increase by 60 to 70% and would create one large urban sprawl, almost joining up with the additional developments approved within Ash and Tongham. The proposed allocation of houses in Normandy is very disproportional compared to many of the other villages and parishes within the Guildford Borough. The proposed demand for additional housing contained within the Local Plan should be spread evenly amongst all the villages and parishes within the Guildford Borough area.
Infrastructure:

Traffic: There are no proposals to improve the existing road systems and footpaths within Normandy and the developments would increase traffic and congestion, not only from transportation of building materials over many years but also the resulting additional housing.

In Normandy, the A323 suffers with congestion with the main junctions at Glaziers Lane and Westwood Lane, as does the A324 at its junction with the A323 at Elm Hill. In particular Glaziers Lane has no continuous footpath from one end to the other and pedestrians have to cross the road twice where there is a humped back railway bridge and a blind bend.

Similarly, there is a narrow railway bridge situated in Westwood Lane, which has a Priority One Way system for vehicles, and co-joining with a blind road junction with Beech Lane. The increase of traffic volumes with this proposed development and the proposed new Secondary School would be dangerous to pedestrians and traffic and cause unacceptable congestion.

Flooding: Flooding frequently occurs due to inadequate surface water drainage and also from the sewer. Both of the system have insufficient capacity for the existing houses and would need to be significantly enlarged to prevent future flooding.

Utilities: The existing overhead Electricity supply would also need to be modernized as it frequently cuts off whenever there is high winds or heavy downfalls of

Shops: Although the proposed development within the area of Site A46 contains provision for shops there is no guarantee that there will be General Grocery shops, within the development to supply the household requirements of food and other domestic supplies. Without these assurances that these types of shops will be provided within the site there would be a significant increase in road traffic on the existing minor roads of Glaziers Lane and Westwood Lane.

Primary School/Nurseries: Wyke School does not have the capacity to absorb the potential increase of children from the significant increase in family homes necessitating major additional building work to increase the number of classrooms

In conclusion, within the Local Plan documentation, Normandy appears to have been identified to take significantly more proposed housing development than many of the other larger Wards within the Guildford Borough Council Planning jurisdiction.

Other Wards appear to have the same or better, transport and community services but Normandy appears to have been singled out to take proportionally more additional housing within the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2018  Respondent: 15358881 / Caroline Hesmondhalgh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to Guildford Borough Council’s draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, on the following grounds:

- It will destroy views from the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
- It will remove 72 hectares of scenic farmland and additional ancient woodland from the Green Belt – a protected area
- It will undoubtedly increase tailbacks on the A31 and traffic congestion
- It will result in rat-running through local roads and increase traffic flows through local villages

Please accept this email as my signed objection to the proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1128  Respondent: 15358913 / Lisa Lewis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

8. I object that there has not been and demand that (a) there should be a significant challenge to the GBC scenario planning and (b) the housing and growth numbers should be revised and especially in the light of uncertainty and change which will accompany Britain’s withdrawal from the EU.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4296  Respondent: 15358913 / Lisa Lewis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

9. Policy D4: I object to the insetting of villages (meaning in fact, removal of villages from Green Belt protections) and the fact that they will suffer from higher density development and the resulting increase in traffic, increased use of infrastructure which is already under pressure. I object in particular to the insetting of West Clandon, Send and the Horsleys. This will have a detrimental impact on Green Belt openness and the views in and out of the AONB in direct contravention of Policy P1 and P2.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I **object** to the fact that infrastructure has not been properly assessed and is inadequate to deal with current housing levels – roads, doctors, schools will not be able to cope.
2. I **object** that housing being proposed on the Green Belt will increase traffic bringing increased danger and pollution and slower journey times on our already overcrowded village roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2. I **object** to the Settlement Boundary which has been imposed on East Clandon without any consultation. This imposition provides no protection to further development outside of the settlement boundary (Policy P2 para 4.3.25) and is deemed by me as being unnecessary in an already tightly developed ancient and rural conservation village with high archaeological merit. I demand that this proposal be removed as it will endanger the openness of the Green Belt, the views in and out of the AONB (protection of the AONB Policy P1) and the character of our village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/4290</th>
<th>Respondent: 15358913 / Lisa Lewis</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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</table>
3. Policy P2 – Green Belt: I object to this significant erosion of the Green Belt with the proposals for large towns being developed on Green Belt land thereby removing the openness of the Green Belt. I note in particular the huge developments proposed for the North East quadrant of the borough which will adversely affect our amenity, but also unfairly targets our tranquil rural villages because we can provide ‘dormitory’ facilities for commuters to London. The developments directly affecting our villages are the proposals for Wisley Airfield, Gosden Hill Farm, various farms and tracts in the Horsleys and Garlicks Arch at Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4291  Respondent: 15358913 / Lisa Lewis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4. Further, on the erosion of Green Belt and I object that Policy P2 is not met where it states that Green Belt should be protected. I object to the disproportionate use of Green Belt land for housing – some 65% of the housing proposed is on Green Belt and with little consideration being given to redevelopment of brown field sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4297  Respondent: 15358913 / Lisa Lewis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object that GBC are contravening the NPPF framework stipulation in paragraph 87 with the proposed developments at Gosden Hill Farm, Ripley, East and West Horsley and Garlicks Arch, Send. Paragraph 87 states “As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.” and GBC have not proven any special circumstance for developing on these Green Belt areas.

2. I note that there were over 20,000 responses objecting to the 2014 draft Plan and therefore I object that the Consultation Process has not been properly followed for this Plan which is not materially different from that plan.

3. I object to building on the Green Belt because the essential characteristic of Green Belt is its openness and permanence (National Planning Policy Framework paragraph 79).

4. I object to all other strategic sites in the Local Plan, Blackwell Farm, 3 Farms Meadows, Garlick’s Arch, West Horsley and Hog’s Back. All are out of proportion to the surrounding area and none qualify for the exceptional circumstances required to take them out of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4292  Respondent: 15358913 / Lisa Lewis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

5. I object to Policy S1 not offering sustainable development as regards roads and rail infrastructure which currently does not cope with demand, congestion on the A3 in particular, but also other A roads in the area such as the A247, the A246 and then there is the already overcrowded and slow train system for those currently living in the borough and needing to commute to London. No pre-emptive planning has been made to alleviate these real problems which will be much exacerbated by any large increases in housing.

I specifically want you to note the winding, narrow and dangerous route via the A247 through West Clandon which then drives people to use a short-cut the even narrower rural road, the Ripley Road, through East Clandon to and from the A3. This will be much exacerbated with the large increase in housing twinned with a large increase in cars and travel.

6. Continuing with Policy S1 (Presumption in favour of Sustainable Development) I object that this is not being met and that GBC are contravening this when it is clear that no fixed plans are available to improve the provision of shops, medical facilities, schools in our immediate area (besides roads and rail already mentioned) to service us. If the GBC were serious about improving the infrastructure and sustainability of our communities, they would have secured plans and funding to ensure these facilities are available and not just at the behest and hoped-for goodwill from the developers. Further, how will developers be held accountable to their promises to build infrastructure? Stories are legion of developers reneging on commitments as the ‘money runs out’ even though vast profits will be made from turning agricultural and Green Belt land into highly valuable housing land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4288  Respondent: 15358913 / Lisa Lewis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to the Guildford 2016 Local Plan

My parents live in East Clandon, at [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998.] and I frequently visit them and spend many days in the village with my family. I am currently overseas so am writing to you by email in respect of the above. Accordingly this letter will not be hand signed.

I object to the 2016 Draft Local Plan as a whole and in particular I object to the specific issues (listed below). I believe that this deeply flawed Local Plan will have a direct and detrimental effect on the amenity currently enjoyed by my family and other residents of East Clandon and to the even greater detriment to our neighbouring villages of West Clandon, Ripley, West and East Horsley. It erodes the openness of the Green Belt and endangers the beauty and views in and out of the Surrey Hills AONB.

My specific points are:

1. I object to Policy S2 for the proposed provision of the very high overall housing numbers of 13,800 new homes (690 new dwellings being built every year for 20 years) and I object on two grounds; these housing numbers have been imposed on the borough with no real consultation being undertaken with the residents of East Clandon and the borough as a whole. Secondly, the housing numbers are based on a high-growth economic development plan which in itself has had no consultation with us and this combined with estimated demand from London residents will turn Guildford into a dormitory town for London.

Further, I object to the fact that no real economic or housing demand factors have been provided by the borough planners to substantiate the very high housing target of 13,800 new dwellings over the next 20 years. This is in direct contravention of the NPPF’s requirement for the planning authority to provide meaningful consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/779 Respondent: 15358913 / Lisa Lewis Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

7. I object to the fact that GBC have not met the requirements of the NPPF Paragraph 155 which imposes an explicit obligation to have early and meaningful consultation. This has not been met in a number of areas by GBC. We have not had a meaningful consultation on imposing a settlement boundary on East Clandon, on the absence of meaningful economic and population growth figures for Guildford showing various scenarios with high, medium and low growth scenarios being offered.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/2019</th>
<th>Respondent: 15358945 / Ian Rose</th>
<th>Agent:</th>
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We object to Guildford Borough Council’s draft Local Plan proposals to build 1800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- Destroy views form the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat-running through local roads
- Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I am writing to register my objections to the very large number of proposed houses and housing developments within the above Parish Council area at Strategic Site A46 for the following reasons:

1. Green Belt:

The intention and importance of the Green Belt is to ensure that the hamlets and villages within it are separated by openness and are not conjoined by large scale housing developments such as those proposed adjoining the west side of Glaziers Lane and the east side of Westwood Lane.
The proposed Local Plan will double the number of homes in the centre of rural Normandy which is designated as Green Belt. Previously Planning Inspectors have declined previous applications and consider that the green fields contribute to the openness of the Green Belt with views to the Surrey Hills AONB.

In June 2015 the Conservative Government and the Prime Minister in their election manifesto said 'we will always protect the Green Belt and make sure planning decisions are made by local people' and only in exceptional circumstances when there are no other options would the Green Belt be allowed to be built on.

1. Destruction of rural environment:

I strongly object to the proposed development of an additional 1,100 houses within the Green Belt and is currently prime pasture/agricultural land.

The Green Belt is in place to check unrestricted sprawl of built up areas which will occur with the number of proposed houses in Tongham and Ash, leaving only a small strip of open land between them and Normandy preventing them from joining up.

It is also to safeguard the countryside from the encroachment of building development. With regard to the proposed Local Plan document these principles appear to have been completely disregarded.

1. Infrastructure:

The existing roads flanking both the east and west side of the proposed site for the 1,100 houses are classified as minor ‘C’ class roads and will not be able to cope with the increase in additional traffic generated by this large development. At present Glaziers Lane (C60) does not have a continuous footpath on any one side of the road from its junction with Flexford Road and the A323 Aldershot Road and pedestrians have to cross the road twice at two very dangerous points on this busy road.

One is the north side of the humped back railway bridge at Wanborough Station and the other one is between Numbers 38 to 43. If the proposed number of houses are built with resulting large increase in traffic there would be a need to have footpaths constructed over the length of Glaziers Lane in the interests of road safety to pedestrians.

Westwood Lane crosses underneath the railway line and is insufficiently wide for 2 way traffic flow (priority to traffic going north to south) which, at busy commuter times, traffic will build up either side of the railway bridge at this point.

The A323 Guildford. Road at commuter times frequently build up through Normandy at present due to the increase in large developments of houses within the ash parish and Rushmoor area.

The increase of traffic travelling up Wanborough Hill /Westwood Lane (C16) to join the A31 will severely increase the queues of traffic travelling east to Guildford or west to Farnham and also the B3006, Puttenham Heath Road to join the A3. These roads are already gridlocked at peak times now without the additional traffic generated by the proposed development.

4) Justification of Second School:

You have suggested that the need for a Secondary School is sufficient 'exceptional circumstance' to justify to build on the Green Belt but GBC have not proven that there is sufficient demand for a new school with regard to existing pupils.

The proposed 1,100 homes appears to be a Developer led development.

The proposed Secondary School land and building being offered by them at nil cost could allegedly be conceived to be an inducement (or bribe) to obtain support from Guildford Borough Council and Surrey County Council to obtain Planning Permission for such a large development on Green Belt land.

The Secondary School, if approved, will generate even more additional traffic and the existing traffic queues at peak times will exacerbate the traffic problems at the start and end of school hours.
The area in Glaziers Lane (C60) where the Hoe stream crosses underneath the road between Numbers 68 and 76 on the west side and Numbers 38 and 43 on the east side is subject to flooding and is designated as an area liable to flooding on the Environmental Agency maps. The flooding occurs when there is heavy continuous rainfall and can occur summer or winter. The two main causes of this flash flooding is the rainwater runoff from houses and driveways with drains connected the main sewer. This causes the 150mm main sewer running south to north to surcharge causing the road and surrounding land and gardens to flood. As the 150mm connects into a 225mm main sewer between Numbers 38 and 48 which is also of insufficient capacity the sewer also surcharges at this point causing additional flooding.

Thames Water is well aware of this flooding problems and there would need to be major increase in sewer capacity if any of the proposed housing developments take place.

The proposed new developments would detrimentally increase the risk of flooding the above mentioned location causing great distress to the residents currently living there.

5. Shops and other Commercial development

These will again generate more traffic on the minor and major roads in the area.

1. Wyke Junior School:

Wyke School does not have the capacity to absorb the potential increase of children from the significant increase in family homes necessitating major additional building work to increase the number of classrooms required.

In conclusion, within the Local Plan documentation, Normandy appears to have been identified to take significantly more proposed housing development than many of the other larger Wards within the Guildford Borough Council Planning jurisdiction.

Other Wards appear to have the same or better, transport and community services but Normandy appears to have been singled out to take proportionally more additional housing within the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am writing to lodge an objection to the 2016 Draft Local Plan, which I believe to be poorly thought through in terms of housing need and proposed infrastructure.

Most importantly, I believe that we must have clarity on the viability of a much-needed tunnel taking the A3 underneath Guildford before committing to building on Gosden Hill Farm, where the tunnel is likely to begin/end.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2023  Respondent: 15359041 / Bridget Deans  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s draft Local Plan proposals to build 1800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- Destroy views form the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat-running through local roads
- Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2025  Respondent: 15359073 / Debra Adams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s draft Local Plan proposals to build 1800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

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- Increase tailbacks on the A31 and traffic congestion

Attached documents:
• Result in rat-running through local roads
• Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4301  Respondent: 15359105 / Nicki Bowen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to lodge an objection to the 2016 Draft Local Plan on the basis of housing need and proposed infrastructure.

I feel that greater understanding around the building of a tunnel and entry/exit points needs to be confirmed before a deeper plan around housing and amenities can be developed further.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4304  Respondent: 15359137 / George Sprankling  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the increased pollution that a large number of houses would create.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4302  Respondent: 15359137 / George Sprankling  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

my objections to the proposed housing development plans for the Horsleys.
I object to the increase in pressure on the services such as, schools, drainage, roads and car parks.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4303  Respondent: 15359137 / George Sprankling  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Furthermore I object to the use of valuable green belt land for building this should be left in trust for future generations and not be allowed to disappear.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2026  Respondent: 15359169 / Peter Miller  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s draft Local Plan proposals to build 1800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

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- Result in rat-running through local roads
- Add to Guildford’s pollution

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/2027  **Respondent:** 15359233 / Nigel Hall  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I understood that the development at the old Wisley Airfield site had been rejected but has been include on the above plan again. The density of the proposed development here is not appropriate for the area and must continue to be rejected by the council.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/4306  **Respondent:** 15359233 / Nigel Hall  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In addition the infrastructure of the area including roads, local facilities such as they are, as well as services for water and drainage are already stretched and in the latter case clearly insufficient. Ockham Road North and South have significant pinch points and the junction by Station Approach is dangerous without introducing more traffic with another junction close by to accommodate more housing by the station.

I understand that the local schools are also full and the medical facilities stretched, I must therefore object to the designation of this area as a District Centre, which clearly it is not nor could be.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/4305  **Respondent:** 15359233 / Nigel Hall  **Agent:**
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<tr>
<td>I am writing to express my objections to the above plan concerning the Horsley area as I cannot see that the exceptional circumstances for removing this area from the green belt have been made.</td>
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Station Parade in East Horsley is currently a village centre with about 15 shops/restaurants, with very limited scope for any expansion. There is no space for additional car parking and access to the shops is already difficult at some times of day. It is not, and cannot become, a “District Centre” with the expansion that implies without building across existing housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4315  Respondent: 15359329 / Andrew & Elizabeth Robinson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Existing village boundaries reflect the ability of the local infrastructure to provide reasonably for the current population. However, the local infrastructure is already overloaded and at times struggles to cope: there are not enough school places, our medical facilities are stretched, the roads and car parks have reached their capacity and the trains are frequently full. We cannot accommodate a significant increase in the local population without people’s quality of life being seriously affected. To increase housing in the Horsleys by over 30% would put a completely unreasonable strain on these villages. Extension of the village boundaries now is a precursor to even more potential development which would be even more detrimental to the environment for existing and new residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4317  Respondent: 15359329 / Andrew & Elizabeth Robinson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Highways Agency has already judged that the access from the A3 to the Horsley/Wisley area is not sufficient to cope with the likely increase in traffic volume from proposed developments. Ockham Road and Forest Road are narrow “B” roads and there is no scope for any effective improvement. The increase in traffic will cause significant local problems, resulting in other, even more minor, local roads being used as “rat-runs” to avoid key junctions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
As long-standing residents of East Horsley we wish to express our objections to the Guildford Local Plan as proposed. We are extremely concerned that the proposed development plans will change the character of several lovely Surrey villages for ever.

We object to the removal of the Horsleys from the Green Belt. There has been no effective demonstration of “exceptional circumstances” as required under the Government’s “Green Belt” Briefing Paper of January 2016. The proposed developments in the Horsleys do not meet the “exceptional” criteria and there is therefore no need for the Green Belt designation to be changed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

- The proposed extent of the development to the east of Guildford, including Gosden Hill Farm, Burnt Common, Wisley and East/West Horsley will create an additional 5,000 homes within the area of a few square miles. An increase in population of 10,000–15,000 people would likely result. This calls into serious doubt the basis of the housing plan. Guildford Borough population increased by 7,500 (5.8%) between 2001 and 2011. To propose houses which can accommodate up to 15,000 people suggests an expected increase just from these few developments, and without taking into account other Borough developments, of over 10%. This increase cannot be sustainable or desirable in the context of an existing population for the whole of Guildford Borough of 137,000 (at the time of the last census).

Overall, we regard the extent of proposed development to the east of Guildford, and specifically in and around the Horsleys, to be out of all proportion to the existing housing stock. They are consequently an unrealistic set of proposals in the context of the sustainable development that can be achieved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s draft Local Plan proposals to build 1800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- Destroy views from the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat-running through local roads
- Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2034  Respondent: 15359489 / David Cave  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s draft Local Plan proposals to build 1800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2033  Respondent: 15359393 / Pauline Ekins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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- Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2039  Respondent: 15359809 / Kathleen Coombes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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- Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2040  Respondent: 15359841 / Liam North  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
We object to Guildford Borough Council’s draft Local Plan proposals to build 1800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

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- Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object the inclusion of new slip roads for access to the A3 at Burnt common (A43a). No mention of who is going to foot the considerable bill for these Trunk road access point additions; as they are being proposed purely to service the extra traffic brought about by the proposed new developments, then it follows that the tax payer should not have to pay, the developers should.

Trusting that these submissions will be acknowledged and duly considered accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4325  Respondent: 15359905 / John Burns  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object most strongly, to implementation of policy D3 and the potential for gross damage to the historic and natural environment; this IMO is an act of vandalism. Almost every portion of GB affected is highly regarded and needed by the local community. In the case say, of Garlick's Arch there, is a sizeable woodland area, including ancient oak trees that will be destroyed.

They are all TPO'd and exist within an area of special scientific interests.

The impact of this loss will more exposure to the polluting effects of the A3 as well loss of vital habitat for wildlife. The NPPF allows for an overall housing target to be reduced to take account of situations like those at Garlick's Arch. Protecting wild life areas (Thames basin Heath SPA), areas of natural recreational resource, AONB, Scientific Interest Areas, Conservation areas, GB and flood risk parts; however, this Local Plan appears to completely ignore any of these requirements?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4324  Respondent: 15359905 / John Burns  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policies E1,E2,E5: I object to.

The first two fly in the face of the fact that a Brown Field site already exists to the south of Burnt Common, yet the GB site is recommended to be used for a mix of warehousing, light industrial and general industrial for sustainable employment, next to what is also proposed as a residential site? The latter is still not necessary IMO and it follows that the former is not either; why? Because it can be housed along with over 100 houses if necessary, on the BF site referred to above. So why create an unnecessary strategic employment site on GB, when a BF site exists nearby to accommodate this growth?

It has to be noted further, that the development of Garlick's Arch would result in the loss of 4 established businesses employing dozens of local people; so IMO this policy is not working in this instance, it is destructive and wasteful as opposed to economic and productive. This is a direct contradiction of the aim of policy E1; again bizarre?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5816  Respondent: 15359905 / John Burns  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5817  Respondent: 15359905 / John Burns  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Policies E1, E2, E5: I object to.

The first two fly in the face of the fact that a Brown Field site already exists to the south of Burnt Common, yet the GB site is recommended to be used for a mix of warehousing, light industrial and general industrial for sustainable employment, next to what is also proposed as a residential site? The latter is still not necessary IMO and it follows that the former is not either; why? Because it can be housed along with over 100 houses if necessary, on the BF site referred to above. So why create an unnecessary strategic employment site on GB, when a BF site exists nearby to accommodate this growth?

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

Policies I1, I2, I3,

I further object to: in a nut-shell, the roads and infrastructure pose a limit to the enforced growth which GBC want to implement; the roads simply could not cope with major increases in vehicles that will derive from increased development and foul waste / rain water drainage are at full capacity already.

Ripley is a good example of the every day build up in traffic congestion: infilling within the Parish boundary and use of the High St. as an ad hoc by-pass for the A3, has pushed levels to saturation at certain times. With greater than 5,000 houses planned close to Ripley, this will inevitably lead to massive grid lock and higher levels of pollution they already registered. This latter point contradicts the intention stipulated within I3, in regard to mitigation of detrimental impact on air quality and public health.

I would also add that to date none of the developments within Ripley's boundary have been charged with improving the community's local road network or foul waste systems. As a matter of common sense IMO that situation will soon become unsustainable in the face of increases in housing and vehicles, unless there are major improvements in infrastructure, paid for by the developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I further object to policy P2 on the grounds that it conflicts with the guidelines, strictures and aims of the National Planning Policy Framework (NPPF) for protection of the GB. The authorities have not demonstrated why the boundaries have been moved when there are NO EXCEPTIONAL CIRCUMSTANCES to warrant such. As such the historic and rural setting of villages like Ripley will be irreparably damaged and any conservation areas will lose their raison d'être.

Development in flood risk areas, Policy P4: this really is stupid, flood risks are all too real yet here the L.A. seem to be encouraging it by allowing such areas to be included within the Plan. Land at Garlick's Arch is a good example of this, it is identified by the Environmental Agency as being in a flood Zone 3; this is the highest risk of flooding each year. Yet the L.A. have categorized the area as a flood zone 2 which has a lower probability for flooding. So we appear to be held hostage by the L.A's attempt to redesignate the areas flood risk despite the evidence of floods each winter?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As follows here are my structured objections: -

Policies S1 & S2: I object to these on grounds of unsustainability and disproportionally. The policy does not reflect the needs of local communities, yet the impact on affected areas will be such as to destroy the physical environments; e.g. villages such as Ripley, Send and Clandon. The absolute and relatively (respectively) isolated sites of Three Farms Meadow and Garlick's Arch are good examples of actual and pending unsustainability. TFM has been refused Planning consent at least on two occasions by no less than 14 sustained objections, yet the developers are allowed to have another try because of the removal of the GB and a predetermination in favour of development; if that's not blinkered ideology pursuing something regardless of economic cost, I don't know what is!

No mention appears to be made of moderation of the overall figure of nearly 14,000 dwellings spread across the Borough, but mostly in the north where the three Wards of Lovelace face the greatest impact. The plan to build over 5,000 houses within five miles from Burpham to the M25 junction with the A3, represents a new town that will swamp old communities in situ.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I attach my objections to this covering email, I have tried to relate them directly to the terms of reference used by Guildford Borough Council; however, I should like to make some fundamental points which I hope the Inspectorate take on board as they point to a flaw, in my opinion, in the Local Plan.

The Plan rests on a market based solution to a housing crisis, one which has suddenly been visited on us, one that we are expected to compliantly accept as being 100% accurate; I do not accept the latter or the former. There is a housing crisis to be sure, it's been building up for decades, successive National Governments, for political reasons, have succeeded in exacerbating it, year on. It is a crisis which is still obfuscated by politicians, mainly due to National Governments ideological bent to markets, thus it remains improperly diagnosed. Are we talking about people not being forced out of their homes, couples unable to afford rents, housing lists growing; or are we observing wealthy speculators manipulating the situation in order to make large profits at the general expense of most others. There is a housing crisis to be sure, it's been building up for decades, successive National Governments, for political reasons, have succeeded in exacerbating it, year on. It is a crisis which is still obfuscated by politicians, mainly due to National Governments ideological bent to markets, thus it remains improperly diagnosed. Are we talking about people not being forced out of their homes, couples unable to afford rents, housing lists growing; or are we observing wealthy speculators manipulating the situation in order to make large profits at the general expense of most others. There is a housing crisis to be sure, it's been building up for decades, successive National Governments, for political reasons, have succeeded in exacerbating it, year on. It is a crisis which is still obfuscated by politicians, mainly due to National Governments ideological bent to markets, thus it remains improperly diagnosed. Are we talking about people not being forced out of their homes, couples unable to afford rents, housing lists growing; or are we observing wealthy speculators manipulating the situation in order to make large profits at the general expense of most others. There is a way to meet ACTUAL housing NEED without all the economic costs entailed within the Local Plan; i.e. creating vast stretches of sterile urban sprawl, mass immigration of people into the borough, pollution and congestion, unnecessary industrial growth and most importantly, despoliation of our natural environment and existing communities. No where has it been demonstrated that that REAL housing NEED, warrants mass private speculative house building; i.e. profit maximising enterprise satiates social need. In fact, actual housing need being met by speculative house building, as the Government would have it, is a vague, if not doubtful, relationship; indeed, the two aims conflict with each other and inevitably produce ugly side effects.

Having scanned the official Government documentation; i.e. The Economic Basis for Housing need, I cannot find any conclusive evidence that provision of such housing schemes, will solve urgent housing requirements per se. The policy rests on an aspiration that a certain amount of social housing has to result from private developments; but in practice does it? Such housing, in the main attracts purchasers who already are adequately housed, it doesn't necessarily follow that social housing requirement would also be met by any take up along the chain of housing vacated concomitantly alongside sales. At the procurement stage of new build homes, there are many ways any social housing element, built-in to any development, can be reduced; e.g. S106 agreements, appeals and 'subjection to economies'. Even if they are agreed under a S106 agreement, houses seen as starter homes are generally out of reach for people on the local Borough's waiting list, who might want to buy; similarly rents.

The data for the need to build houses - the strategic Housing Market Assessment (SHMA), originates mainly from interested parties, and it's usually stamped as commercially confidential; IMO, it's skewed, inaccessible and uncontestable. Worst still, the policy for gross invasion into the Green Belt is actually being driven by similar, if not the same interested parties, many of whom donate large amounts to fund the Party in Government. So access to analyse, let alone accurately judge whether these figures represent reality, is somewhat limited. One thing is for sure; if anyone wants to move house within our parishes, you only have to go to the nearest estate agent, you won't find it a problem to locate something to your liking. No one is saying a moratorium on private house building, far from it, but you don't necessarily need mass estates built to increase choice, especially when that in itself is
likely to lead to the destruction of an environment that you desired in the first place. There are however, accessible and easily understandable statistics available from Local Authorities, showing accurate housing requirements in the Borough; i.e. numbers and categories of folk registered on the housing list. If that housing NEED was met PROPERLY and as a priority, then the pressure for private building development would diminish, and similarly the pressure on the GB.

It should be clear to those trying to administer the Governments plan, that the crisis started over thirty years ago with another market based policy: Local Authority Housing stocks were systematically reduced by the tax payer subsidised policy of the 'Right to Buy'. In one foul swoop thousands of dwellings were taken from local authority stocks, and not replaced by new build. The result was, despite some heroic efforts made by LA's and the formation of Housing Associations, that social housing struggled to keep pace with demand. Private rented accommodation was supposed to provide where the L.A. could not, or rather, was prevented doing so; that too was a failure. Nearly 40 years on, Central Government now is imposing an even worse policy, via it's Housing Bill. Sanctioned in May 2016, once again the private sector is seen as the panacea to the lack of rentable accommodation and a gateway to house ownership for all; bizarre!

Municipal stock that remains, as well as prime Housing Association stock, will be forcibly sold off via the 'right to buy' mk 2 - at a major cost to the tax payer, again.

As the private sector has historically failed to provide affordable rented accommodation, it is hard to see how such a policy will succeed this time round, especially now that matters emanating from the issue affect most all households, not just those renting Council or H.A. houses. The Governments vision of a home owning utopia is not only unrealistic, but in life, undesirable. You don't need to own something to call it your home: rented accommodation that is well managed and reasonable to pay for, is a way forward for many who want a home proper whilst keeping their mobility, be able to save, and able to plan their future without the burden and responsibility of a mortgage and all that might entail in keeping up with payments. It is the rented sector that has been scandalously neglected IMO by successive Governments; it is this sector in which the L.A. could and should, play a rightfully important role once again. So IMO, the Plan is an ideological sledge hammer, it masks alternative strategies that would not incur the gross diseconomies which will undoubtedly spring from implementation of the Governments Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/2048  Respondent: 15360065 / Alan Staines  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

5) Development of over 2000 house village at Ockham ( former Wisley Airfield ).

   The impact on the Horsley villages of such a huge mixed housing, retail, commercial traveller, and schools development less than 2 miles distant from the Horsleys would be enormous.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4346  Respondent: 15360065 / Alan Staines  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4) Station Parade is designated a " District Centre ".

   This designation reflects a complete misunderstanding of the nature of the facilities in the village centre and would as a consequence inappropriately focus attention on Station Parade as an area for future urban development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4345  Respondent: 15360065 / Alan Staines  Agent:
3) Infrastructure already in overload.

   The local schools are full.
   Medical facilities are stretched.
   Drainage is inadequate.
   Roads and car parks are overloaded with little
   or no scope for improvements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1) Proposal to remove the Horsleys from the Green Belt.

   The "exceptional circumstances " required before taking action have not been demonstrated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1) Proposal to remove the Horsleys from the Green Belt.

   The "exceptional circumstances " required before taking action have not been demonstrated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
2) Extension of the boundaries of the Settlement areas of the Horsleys.

The proposed changes seem to have the sole objective of increasing the land available for future additional development but no reasons have been given for the proposed changes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Many aspects of the Guildford Local Plan proposing 593 new houses in the Horsleys within 5 years of its adoption give cause for concern and indeed objection. Accordingly my views are set out below for due consideration by the appointed independent inspector as appropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Major doubt concerning housing numbers.

The derivation of a mathematical model of a Strategic Housing Market Assessment (SHMA) without disclosure of the hypotheses and postulations used or of, for example, standard deviation in the results clearly does not permit any assessment of its validity and reflects poor scientific practice.
The doubt concerning this SHMA target housing figure is further compounded by the Guildford Borough Council inflating the SHMA figure to give a figure for population increase which is almost 70% higher than the official national estimates for population growth in the Borough.

This results in the figure of 593 new houses proposed in the Horsleys within 5 years following adoption of the plan.

The scale of this enormous increase is demonstrated in that it would result in an increase of up to 35% in existing West Horsley households - a truly alarming figure and greater than any other single area in the Borough.

I trust that my concerns will be fully considered by the appointed independent inspector.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2050  Respondent: 15360129 / Steven Lee  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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We object to Guildford Borough Council’s draft Local Plan proposals to build 1800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

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- Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
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- Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2053  Respondent: 15360193 / Denise Walters  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2060  Respondent: 15360321 / Jean Miller  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to Blackwell Farm being included in the Plan (Policy A26) because:

it is situated entirely within the Green Belt

more people objected at the previous consultation to the inclusion of this site than any other and the Council has clearly failed to listen

an independent consultant has very recently declared the site as being “of AONB quality”. On this basis, it should be excluded.

traffic problems resulting from this development would be detrimental to the whole area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9581  Respondent: 15360321 / Jean Miller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the amount of additional retail development proposed in the Plan. This seems to ignore changes in shopping habits and the impact of the internet.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9579  Respondent: 15360321 / Jean Miller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The local infrastructure is patently unable to cope with the growth assumed in the Plan as doctors’ surgeries, schools and particularly roads, are currently struggling to cope with the needs of the existing population. Specifically, there is an omission to the Plan as it excludes the Town Centre Master Plan and the effect this could have on the infrastructure, specifically traffic in the outlying villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/9582  Respondent: 15360321 / Jean Miller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that the traffic impact of the Plan on Compton has been effectively ignored. With the proposed developments at Blackwell Farm (1,800 homes), Normandy (1,000 homes), Ash (1,300 homes) and proposed developments at Aldershot and Bordon, the increase in traffic on the B3000 in Compton is likely to be severe. In fact, the Highways Assessment ranks the B3000 only just below the major A roads and Trunk roads in terms of negative traffic impact. No solutions or steps to achieve some mitigation are offered and I therefore strongly object to the level of building proposed in the Plan and would question why no constraint to the numbers proposed had been applied to reflect this major issue.

Still on the subject of the B3000, GBC has undertaken NO2 readings for a number of properties on the Street (B3000) in Compton. I am aware that one property on the B3000 has exceeded the recommended limit. This fact is known to GBC and I object to the Air Quality problem in Compton not being referred to in the Plan. This is particularly relevant bearing in mind the forecast additional traffic Compton will be getting (see paragraph 6 above).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9577  Respondent: 15360321 / Jean Miller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the “insetting” of so many villages from the Green Belt. (paragraph 4.3.13). The “special circumstances” used to justify this excessive use of the Green Belt are that the Plan’s growth targets require this. However, as stated above, this is all because the SHMA is too high. Get the SHMA down to a sensible level, and the wholesale raid on the Green Belt would not be necessary.

In 2014, many people objected to the proposed Plan, partly because they considered too much Green Belt was to be developed. However I now see that an even greater percentage of homes is scheduled to be built on Green Belt. I strongly object to this as Green Belt should have been used as a constraint.
**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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I object to the number of additional homes being set at 13,860 (or 693 homes per year). (Policy S2) I consider this to be too high for the growth we actually need in the Guildford area. It is unacceptable for the Council not to disclose how the SHMA is arrived at and given the fundamental importance of this figure to many aspects of the Plan, it is totally inappropriate to hide behind the comment that this is proprietary information.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2082  Respondent: 15360737 / John Nottall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Attached documents:

Comment ID: PSLPS16/2083  Respondent: 15360801 / John Robert Boff  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
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Answer (if comment is on questions 1-7 of the questionnaire): ()

I live in Normandy and I do not wish the village to be ruined by overdevelopment damaging our environment. The position of Normandy is not suitable for such an increase in the size of the village. Anybody who has travelled into Guildford from Normandy and vice versa knows how clogged the roads are, how quickly the whole system comes to a standstill.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4364  Respondent: 15360993 / J Corrie  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The plan proposes to use green belt land destroying for ever an asset we all enjoy and wish to pass onto future generations. We should be cautious, politics is moving very fast and what may have seemed pragmatic before 23rd June may on reflection appear unduly hasty. We need to review the situation in the light of the changed circumstances.

In conclusion THERE IS NO EXCEPTIONAL CIRCUMSTANCES TO JUSTIFY USING GREEN BELT LAND NOR FOR REMOVING LAND FROM THE PROTECTION OF BEING GREEN BELT LAND.

The need for large scale developments is now changed since we have made the decision to leave the EU. There is no benefit for Normandy only the destruction of a village this village has a long history and played its part in the last war in preserving our democracy. Normandy with with fields and wildlife should not be sacrificed for a flawed plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4363  Respondent: 15360993 / J Corrie  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
GBC plan for building a certain number of dwellings within the borough is now obsolete. The way the proposed number were calculates, I understand, are not overt so we can all understand the logic for the decisions. The need to build in such numbers was calculated in the situation we were in before 23rd June 2016. The situation has changed and we are now leaving the EU so the need to fulfil their requirements is now null and void. We will have a new Prime minister in position from Wednesday 13th July 2016.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

__Comment ID: PSLPS16/2085  Respondent: 15361025 / Stephen Mortimer  Agent:__

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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__Comment ID: PSLPS16/2087  Respondent: 15361121 / Tom Williams  Agent:__

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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Attached documents:
Comment ID: pslp172/1128  Respondent: 15361217 / Michael Jeffery  Agent:

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Comment ID: PSLPS16/2090  Respondent: 15361313 / Carol Tunnell  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Attached documents:

Comment ID: pslp172/974  Respondent: 15361377 / Maureen Butler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: PSLPS16/2093  Respondent: 15361409 / Charlotte Ayshford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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**Comment ID:** PSLPS16/2094  **Respondent:** 15361569 / Andrea Bradley  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/2095  **Respondent:** 15361601 / Sarah Metcalfe  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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We object to Guildford Borough Council’s draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- Destroy views from the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat-running through local roads
- Add to Guildford’s pollution
I am writing to you to OBJECT to policy A26 (Blackwell Farm) for the following reasons -

Inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9]:

1) disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]

2) directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas

3) ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]

4) adds to air pollution in neighbouring areas, which already exceeds safe EU limits for Nitrous Oxide [Policy A26].

Please understand and the strong feeling in the surrounding communities that this development is not wanted nor needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4845  Respondent: 15364769 / Anita Betts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2099  Respondent: 15364833 / Brenda Cooper  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2100  
Respondent: 15364961 / Colin Hill  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2101  
Respondent: 15364993 / Margaret Benwell  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2102  Respondent: 15365121 / Vitahlbhai Patel  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2103  Respondent: 15365153 / Anne Olisen  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2106   **Respondent:** 15365313 / David Chandler **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2107   **Respondent:** 15365345 / Jerey Nolds **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2111  Respondent: 15365505 / C. E. Sherwood  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2112  Respondent: 15365569 / J.H. Sherwood  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

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Attached documents:

Comment ID: PSLPS16/8210  Respondent: 15365633 / E Delaney  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2116  Respondent: 15365697 / R. Humpherson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Attached documents:

Comment ID: PSLPS16/2117  Respondent: 15365825 / O Senberg  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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Attached documents:

Comment ID: PSLPS16/2118  Respondent: 15365857 / Andrew Myers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Comment ID: PSLPS16/2121  Respondent: 15365953 / J.K. Coghill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? (), is Sound? (), is Legally Compliant? ()

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Comment ID: PSLPS16/2122  Respondent: 15365985 / Peter Musseau  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? (), is Sound? (), is Legally Compliant? ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1140  Respondent: 15366209 / Corinne Singleton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO the lack of any evidence for the alleged housing need or numbers

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1141  Respondent: 15366209 / Corinne Singleton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4373  Respondent: 15366209 / Corinne Singleton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

7. I OBJECT TO the lack of immediate provision for new schools
   1. I OBJECT TO the lack of any immediate provision for new Doctors surgeries
   1. I OBJECT TO the fact that any new buildings in the proposed areas will increase the already large flow of traffic that comes through Ripley and Send.
   2. I OBJECT TO the fact that you are not proposing to use any brown field sites and it was part of the Conservatives mandate to 'SAVE THE GREENBELT'

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4371  Respondent: 15366209 / Corinne Singleton  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT TO all erosion of the green belt
   2. I OBJECT TO any "insetting" (ie removal) of any villages from the green belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4370  Respondent: 15366209 / Corinne Singleton  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am writing to strongly object to Guildford Council's planning proposals to build up to 14,000 new homes under the revised draft local plan. Form the literature I have received I note with serious concern that the proposal is for large 'strategic sites' at Garlick's Arch (Burnt Common), Wisley and Gosden Hill.

It seems that you are aiming to remove our local villages from the green belt and this will allow unlimited future development and the destruction on our rural villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4372  Respondent: 15366209 / Corinne Singleton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT TO the disproportionate amount of development in one area of the Borough
2. I OBJECT TO the extremely limited consultation period
3. I OBJECT TO the last minute inclusion of new sites with less than 2 weeks notice

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslpp172/2031  Respondent: 15366209 / Corinne Singleton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A42 - Clockbarn Nursery, Tannery Lane
1. I object to your proposal to increase the 60 homes in place of the 45 homes, which amounts to an increase of 33%. How can you justify this increase?
2. It ignores the hundreds of objections raised by local people already.
3. It will without doubt have a serious impact on traffic levels and traffic problems in Tannery Lane and at the A247 junction
4. It will also make the erosion of the green belt in Send Village much worse.
5. It will also make surface water flooding, which is already a problem far worse.
6. It will have an effect on the open countryside views from the River Wey Navigation
<table>
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<tr>
<th><strong>Comment ID:</strong> pslp172/2033</th>
<th><strong>Respondent:</strong> 15366209 / Corinne Singleton</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

Policy A43 Land at Garlick's Arch, Send Marsh
I object to the A43 changes at Garlick's Arch as follows:
1. You have completely ignored the thousands of previous objections made by local people
2. Why should there be a plot for Travelling Show people in this location when there is no proven demand for this? These people lead a transient lifestyle and therefore there is no need to provide them with a plot of land.
3. You have not provided nor can you justify your reasons for proposing to build on the beautiful permanent Green Belt, there are no exceptional circumstances to allow you to do this.
4. Your proposals will mean our village is 'over developed' and the number of homes excessive.
5. We have beautiful and exquisite ancient woodland that have existed since the time of Elizabeth 1, why do you want to destroy this?
6. These changes will join up Ripley and Send and completely defeat the purpose of the Green Belt
7. This area is subject to flooding and is currently in flood zone 2 and it is contaminated with lead shot which has built up over the last 50 years
8. It will generate more traffic that will cause chaos in the local roads of Ripley and Send

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
Policy A58 - Burnt Common
My objections are that this was deleted from the 2014 Draft - why have you now resurrected it and added it to the revised proposal?
1. There has been a decline for the need of industrial land - many office buildings and industrial lands stand derelict why build more?
2. Slyfield and Guildford have empty sites and industrial units - USE THESE FIRST. There is no need to build an industrial or warehouse unit in the middle of the Green Belt.
3. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt.
4. The impact on narrow surrounding country lanes will create traffic gridlock
5. As stated before it will join up existing villages and defeat the purpose of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I OBJECT TO the fact that any new buildings in the proposed areas will increase the already large flow of traffic that comes through Ripley and Send.

I OBJECT TO the fact that you are not proposing to use any brown field sites and it was part of the Conservatives mandate to ‘SAVE THE GREENBELT’

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1. I OBJECT TO all erosion of the green belt
2. I OBJECT TO any "insetting" (ie removal) of any villages from the green belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/4374  Respondent: 15366529 / Roger Singleton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to strongly object to Guildford Council's planning proposals to build up to 14,000 new homes under the revised draft local plan. Form the literature I have received I note with serious concern that the proposal is for large 'strategic sites' at Garlick's Arch (Burnt Common), Wisley and Gosden Hill.

It seems that you are aiming to remove our local villages from the green belt and this will allow unlimited future development and the destruction on our rural villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4376  Respondent: 15366529 / Roger Singleton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT TO the disproportionate amount of development in one area of the Borough

2. I OBJECT TO the extremely limited consultation period

3. I OBJECT TO the last minute inclusion of new sites with less than 2 weeks notice

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1143  Respondent: 15366721 / Sylvia Newton  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Consideration

None At All - for residents in the areas chosen for houses, industrial buildings and building of new 4 way on/off ramp to A3 at Burnt-Common

No Common Sense.

I strongly object. To the 2016 Draft Local Plan

Conservatism

None. It was Promised Nothing on Green Belt.

I strongly Object

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4379  Respondent: 15366721 / Sylvia Newton  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I Object to the lack of immediate provision for new schools

I Object to the lack of any immediate provision for larger or more doctors surgeries

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4382  Respondent: 15366721 / Sylvia Newton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
<table>
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<tr>
<th>Comment ID: PSLPP16/4380</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I object to the all erosion of the Green Belt

Some re-thinking is certainly required

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: pslp172/2802</th>
<th>Respondent: 15366721 / Sylvia Newton</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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Policy A25 I object. I do strongly object to every single one of these proposals on the grounds of their severe and [illegible word] envorionmental impact.

Especially to the slip roads to the A3 at Burnt Common causing increased traffic pollution and unjustified sacrifice of GREEN BELT land, and historic woodland.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: pslp172/2800  Respondent: 15366721 / Sylvia Newton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A43 I object. Revised proposal on the grounds of absolutely no infrastructure to support development. Services in Send already saturated. Schools – Dr Surgery –

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2799  Respondent: 15366721 / Sylvia Newton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

New Policy A58 I object. The most unsuitable policy for this area. As already it is impossible to leave the road we live in and environmentally a disaster. What about further up the A3 where the slip road is already partially in existence. With no interference [illegible word x2] homes. Possibility all round for purpose of traffic [illegible word].

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4387  Respondent: 15366945 / M Wick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
I am writing to you over the proposal to take Chilworth and other villages out of the Green Belt.

As Chilworth, since 1945 on and off has had continuous development, and enough is enough, and the Green Belt, what is left of it should be untouchable.

The removal of it would be give the so called developers the green light. Note, I called them "So called developers". I would like call them "Butchers of the land", Most of them live in offshore tax havens and they could not care less about the devastation of rural England which means so much to us.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Answer (if comment is on questions 1-7 of the questionnaire): ()

DRAFT LOCAL PLAN – CONSULTATION

Wisley Airfield – Site A35

This letter addresses the proposals contained in June 2016 Guildford BC Draft Local Plan for 2013 - 31 for substantial extra housing across the Borough, and particularly at Wisley Airfield close to my home.

In conjunction with my husband, I OBJECT to this ridiculous proposal to begin an unsustainable wedge of development between London & Guildford which will be uncontrollable in the future through the precedent set by this Plan, and support all his comments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1146  Respondent: 15367361 / Greg Ganjou  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. APPENDIX C

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1145  Respondent: 15367361 / Greg Ganjou  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1147  
Respondent: 15367361 / Greg Ganjou  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. APPENDIX D

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially
confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPS16/2130  **Respondent:** 15367361 / Greg Ganjou  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **POLICY A25 - Gosden Hill Farm**

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.
If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2131  Respondent: 15367361 / Greg Ganjou  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY A43 AND A43a – Garlick’s Arch

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)
The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic. The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.
This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4401  Respondent: 15367361 / Greg Ganjou  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY D3

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4408  Respondent: 15367361 / Greg Ganjou  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY D3

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. POLICY D4

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4409  Respondent: 15367361 / Greg Ganjou  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E1

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and
general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E5

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E6

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is
likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4407  Respondent: 15367361 / Greg Ganjou  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E7

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes
could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H1

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.
It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>Comment ID: PSLPP16/4406</th>
<th>Respondent: 15367361 / Greg Ganjou</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

1. **POLICY H2**

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of £360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<th>Comment ID: PSLPP16/4410</th>
<th>Respondent: 15367361 / Greg Ganjou</th>
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1. **POLICY H3**

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations Ire available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The policy wording itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
1. POLICY I1

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists pass through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable
(and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4403  Respondent: 15367361 / Greg Ganjou  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY I2

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).
Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1. POLICY I3

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Re: Responses to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, and I just do not understand how you can propose development on the green belt when I have been told by your office on a different matter that ANY development in the green belt is harmful and with no very special circumstances, therefor against national planning policy and more importantly the wishes of the local residents that will have to live with these ridiculous and unnecessary decisions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>PSLPP16/4396</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is...
I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. SITES - POLICIES A1 TO A57

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4413  Respondent: 15367361 / Greg Ganjou  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4397  Respondent: 15367361 / Greg Ganjou  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY P4

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4394  Respondent: 15367361 / Greg Ganjou  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy
does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. **POLICY S2**

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.
It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>SQLP16/791</th>
<th>Respondent:</th>
<th>15367361 / Greg Ganjou</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
<td></td>
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</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Questions posed by Guildford Borough Council as part of its consultation.

Questions from GBC

24.A. Question 1: The evidence base and submission documents

The Proposed Submission Local Plan: strategy and sites is based on up-to-date evidence. The evidence base documents contributing to the preparation of the plan are listed in Appendix D and can be found on our website (links open in a new window).

Do you agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant?

ANSWER

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

2. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  SQLP16/792  Respondent:  15367361 / Greg Ganjou  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
24.B. Question 2: Legal Compliance

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant? Please provide the following information being as precise as possible:

- why you consider it is or is not legally compliant and
- what change(s) (if any) you consider necessary to make it legally compliant, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/793  Respondent: 15367361 / Greg Ganjou  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

24.C. Question 3: Soundness

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound? Please provide the following information being as precise as possible:

- why you consider it is or is not sound and
- what change(s) (if any) you consider necessary to make it sound, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites-which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.
5. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation

1. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
2. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
3. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
4. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
5. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
6. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
7. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
8. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.
9. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens
10. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

11. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

12. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

13. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

14. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/794  Respondent: 15367361 / Greg Ganjou  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

24.D. Question 4: Duty to cooperate

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate? Please provide the following information being as precise as possible:

- why you consider it has or has not complied with the Duty to cooperate and
- what change(s) (if any) you consider necessary to make it comply with the duty to cooperate, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.
Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPA16/1151  **Respondent:** 15368129 / Sharon Cork  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):**

1. **APPENDIX C**

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPA16/1149  **Respondent:** 15368129 / Sharon Cork  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

1. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

2. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

3. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1152  Respondent: 15368129 / Sharon Cork  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. APPENDIX D

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
• issues with the way it considers students and affordability and
  • flaws in the method for estimating the number of homes needed to support job growth.
  • It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2141  Respondent: 15368129 / Sharon Cork  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY A25 - Gosden Hill Farm

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data
• Clandon Cross Roads Area to Bulls Head - 17 incidents
• Bulls Heads Head to Bennett Way - 8 incidents
• Bennett Way to Highcotts Lane - 15 incidents
• Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015


2016

• 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
• 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
• 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.
The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a
dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it
wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be
uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West
Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around
14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s
requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in
the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow
for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried
out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2142  Respondent: 15368129 / Sharon Cork  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY A43 AND A43a – Garlick’s Arch

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby
way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport
links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for
journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause
the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this
important issue has been addressed. The Green Belt and Countryside study did not even consider this site.
It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.
I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4432  Respondent: 15368129 / Sharon Cork  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY D3

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4439  Respondent: 15368129 / Sharon Cork  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. POLICY D3

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4440  Respondent: 15368129 / Sharon Cork  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY D4

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4429  Respondent: 15368129 / Sharon Cork  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. **POLICY E1**

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: PSLPP16/4430  **Respondent:** 15368129 / Sharon Cork  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

1. **POLICY E2**

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.
There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4431 Respondent: 15368129 / Sharon Cork Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E5

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4442 Respondent: 15368129 / Sharon Cork Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E6

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For
example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/"Disneyfication". Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **POLICY E7**

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable
residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4436  Respondent: 15368129 / Sharon Cork  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H1

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.
It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4437  Respondent: 15368129 / Sharon Cork  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H2

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4441  Respondent: 15368129 / Sharon Cork  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H3

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being “closely related”. In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY I1

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable
(and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/4434</th>
<th>Respondent: 15368129 / Sharon Cork</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY I2

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).
Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4435  Respondent: 15368129 / Sharon Cork  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY I3

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4427  Respondent: 15368129 / Sharon Cork  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. **POLICY P2**

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.
This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. **POLICY P4**

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **POLICY S2**

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these
adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN Ire not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Questions posed by Guildford Borough Council as part of its consultation.

24.A. Question 1: The evidence base and submission documents

The Proposed Submission Local Plan: strategy and sites is based on up-to-date evidence. The evidence base documents contributing to the preparation of the plan are listed in Appendix D and can be found on our website (links open in a new window).

Do you agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant?

ANSWER

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up-to-date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### 24.B. Question 2: Legal Compliance

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole is legally compliant? Please provide the following information being as precise as possible:

- why you consider it is or is not legally compliant and
- what change(s) (if any) you consider necessary to make it legally compliant, explaining why this is the case.

**ANSWER**

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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### 24.C. Question 3: Soundness

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound? Please provide the following information being as precise as possible:

- why you consider it is or is not sound and
- what change(s) (if any) you consider necessary to make it sound, explaining why this is the case.

**ANSWER**
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.

3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford’s circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.

2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation

2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation

3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound

4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018

5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars

6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham

7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework

8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.

9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and
foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.

11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councillors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/801  Respondent: 15368129 / Sharon Cork  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

24.D. Question 4: Duty to cooperate

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate? Please provide the following information being as precise as possible:

• why you consider it has or has not complied with the Duty to cooperate and
• what change(s) (if any) you consider necessary to make it comply with the duty to cooperate, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.
The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This morning it has taken me seven minutes to get out of Sanger Drive onto the main road, so you can imagine what it will be like for me if you allow all these extra houses to be built.

So I object to Policy A43 30km of land at Garlicks Arch, particularly as this was not mentioned at the last meeting in Send I attended, an dthe thought of 400 more houses, probably with two cars each, fills me with horror.

I also object to Policy A44 1.9km Land on Send Hill - again more houses and again a new proposal and the narrow raods to approach the site are certainly not suitable access for a travellers pitch!!

I wish these objectives to be seem by the inspector and also wish to object to send being removed from the Green Belt as it is a buffer zone between Guildford and Woking.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I would Just like you to know that I STRONGLY OBJECT:

To take away our Green Belt in Send

To the Green Belt being built on at Send, Garlick Arch, Send Hill and Clockburn Nurseries as I was told we would have the Green Belt Permanently that is why I bought our Bungalo in Send so we all can enjoy it.

To the amount of housing that is needed 13,860 with this amount needed you would have to use the Green belt I say NO

To ALL in Send and Surrounding areas why can you not use the Brownfield area around Guildford. Not in Send

Also to the interchanging onto the A3 at Burnt Common as we have a lot of traffic now. So with this we would be at a standstill and make Send like a car park in the Rush Hour. Also Send would be used as a cut through to the A3 and M25 also the A247. Why cant you use slyfield for the industrial space

To the site of Garlicks Arch which is known for flooding in the area

To the 45 houses at chockbarn. How are we able to take the traffic through tannery lane as it is to narrow. this road would not take the extra traffic

I object to this site on Send Hill as it has a lot of Green Belt and it is an area of Beautiful Countryside also it was used for land fill years ago and I know there was unsafe waste put in this site. Also to have 2 travellers pitches included there is insufficient acces to this and will also encourage more travellers to park themselves on this site. NOT HAPPY

The GBC has not identified the sufficient Brownfield sites around Guildford, Send, Wisley, Horsley. This will destroy the open amenities of teh Greenbelt also the A3 will end up Gridlocked and the surrounding areas, they are Bad Now so what would happen with all the extra traffic. I wish to breath in FRESH AIR NOT FUMES FROM THE EXTRA TRAFFIC

To the inadequate requirements for the infrastructure of our Village. How will the schools and doctors cope with all this extra traffic.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/1159  **Respondent:** 15368321 / P. Miller  **Agent:**  
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send  

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**
I am Objecting to ALL of the plans in and around Send village. Due to eg:

Taking away Green Belt which would destroy all of the lovely countryside Green Belt is meant to be Permanent.

The extra traffic which the Roads and Lanes will not take the extra traffic. Also the schools and the doctors we are having problems now so it will not be able to take these extra persons.

To the 2 travellers pitches which is inappropriate to put them where there is only single track roads so their would be insufficient access to this site also to encourage more to move in on that site.

The interchange at Burntcommon will not work as it will be Gridlocked for nearly all day and the A3 will become congested most of the day as well.

To 70% of the proposed 13,860 houses to be built on Green Belt.

To the infrastructure has not been properly considered and are inadequate to deal with all these proposed housing to be built.

Why are GBC not using up all the Brownfield Sites?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID: PSLPP16/4470  Respondent: 15368513 / Nicola Owens**

**Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

**POLICY H2: Affordable Homes.**

Under Policy H2, 40% of all but the smallest development sites in East Horsley will be required to have affordable housing built upon them and 40% of those should be 1 bed apartments, regardless of whether there is actually demand for more social housing in the area. East Horsley has the lowest demand for affordable housing in the borough. East Horsley is not exempt from the new ‘right to acquire or enfranchise’ entitlement as it is not classified as a ‘rural area’ (1997 Housing Order) so affordable housing in the parish may be bought for a quick resale at a profit and so lost to the market for which they were intended.

I **OBJECT** to Policy H2

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID: PSLPP16/4472  Respondent: 15368513 / Nicola Owens**

**Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

NFRASTRUCTURE POLICIES

This section of the Proposed Submission Local Plan sets out details covering a range of infrastructure policies.

POLICIES I1 Infrastructure & Delivery

I2, Supporting the Department of Transport’s ‘Road Investment Strategy’

I3 Sustainable Transport.

I support the general policy statements in each area but the detailed infrastructure proposals appear inadequate. There are serious deficiencies in the infrastructure of Guildford Borough as it is today and GBC’s aggressive housing policy in the Proposed Submission Local Plan will make this worse. There appears to be no strategic plan for additional capacity in schooling and health care and for the narrow and already busy roads in the Horsley area.

If every new house has at least 2 cars, this means potentially 6,000 more cars within a three mile radius of the villages. The impact on local roads and transport facilities will be enormous. Parking at Horsley & Effingham junction stations, which are currently at capacity, at the shops, at the medical centre and at the village hall will all be affected. Local schools are already at capacity and no extra places are planned in the Horsleys.

The proposals for development at Wisley Airfield and for an upgrade the current A3 junction at Burntcommon to a full 4-way junction, SCC traffic modelling anticipates increased use of Guileshall Lane (single track with passing places!), Hungry Hill Lane and Tithebarns Lane for traffic accessing the A3 at Burntcommon in order to travel to Guildford and beyond. Traffic approaching Guildford from the M25 at peak times is already queuing back as the A3 goes from 3 to 2 lanes at the Guildford junction. The SCC report states that “consequently, it indicates that further thought may have to be given to managing traffic in this area as part of a transport assessment should the development be progressed”. The Plan is proposing a strategic site at Wisley Airfield without identifying what improvements to the local road infrastructure will be required.

I OBJECT to the proposals for infrastructure because they are inadequate to support the proposed developments

POLICY A39: Land behind Ockham Road North, near Horsley railway station

Policy A39 proposes a housing development of some 100 dwellings on a 5.7acre green-field Green Belt site behind the houses on the western side of Ockham Road North. I believe that the proposed western movement of the settlement boundary needed to bring this site within the settlement area is unjustified and contrary to NPPF rules. If this boundary movement is invalid then this site remains a part of the Metropolitan Green Belt.

I OBJECT to Policy A39.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY P2: Green Belt – East Horsley should be inset from the Green Belt

East Horsley’s rural village character has been preserved because of its Green Belt status. Currently development is allowed within the village settlement boundary within a particular planning regime. GBC attributes the need to inset East Horsley to National Planning Policy Framework (NPPF) requirements, arguing that the test for remaining ‘washed over’ is that the village should make an important contribution to the openness of the Green Belt. About 36% of East Horsley is composed of woodlands, whilst inside the settlement area there is an average housing density of just 8.1 dwellings per hectare ‘dph’) with many houses having large gardens which make a significant contribution towards bio-diversity, allowing wildlife corridors and open spaces which are vital to the character of the greenbelt.

I OBJECT to Policy P2

Paragraph 4.3.16 and Proposals Map: Settlement Boundary changes in East Horsley.

I object to two specific boundary changes, which have been proposed:

a) The proposal to move the East Horsley settlement boundary westwards from behind the houses on the west side of Ockham Road North up to the eastern boundary of Lollesworth Wood will remove over 5 hectares of agricultural fields from the Green Belt. The present boundary line is clearly defined by a deep and well-maintained drainage ditch which is classified by the Environment Agency as a ‘main river line’ and therefore represents a highly defensible Green Belt boundary. Moving this boundary west to the edge of woodland in no way improves its defensibility. NPPF rules Green Belt boundaries should only be changed in ‘exceptional circumstances’. I do not believe this proposal can be considered as an exceptional circumstance. The only reason for this change seems to be to bring a large agricultural field within the settlement area in order to provide more housing land. However, under NPPF rules this is not a sufficient justification for changing a Green Belt boundary. It is therefore an invalid proposal and I OBJECT to this proposed boundary change.

b) The proposal to move the East Horsley settlement boundary westwards from behind the houses on the west side of Kingston Avenue up to a tree line running along the Parish Boundary at the western edge of Kingston Meadows (the main public recreational space of East Horsley, comprising various sports facilities and playing fields) will result in taking all of Kingston Meadows out of the Green Belt. The present settlement boundary is clearly defined by a deep and well-maintained drainage ditch running along its eastern side. It therefore again represents a very defensible Green Belt boundary. Moving this boundary westwards to the edge of woodland in no way improves its defensibility. Under NPPF rules Green Belt boundaries should only be changed in ‘exceptional circumstances’. I do not believe that this can be considered as an exceptional circumstance.

It is therefore an invalid proposal and I OBJECT to this boundary change.

Paragraph 4.3.17: Proposal to remove Wisley Airfield from the Green Belt

The only justification for this proposed change is unfulfilled housing need which is not considered an exceptional circumstance.

I OBJECT to the proposal to remove Wisley Airfield from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4469  Respondent: 15368513 / Nicola Owens  Agent:
Re: Comments on Proposed Submission Local Plan

I OBJECT to the propose submission local plan on the following issues

- The increase in house stock by 25% is not supported by the estimates of increased population (+15%)
- Many of the proposed developments are on existing Green Belt land
- The proposed infrastructure is insufficient to support the proposed developments

POLICY S2: Borough Wide Strategy.

By adding 13,860 new homes to Guildford Borough Council (GBC) over the 2013-2033 period of the Proposed Submission Local Plan, this represents a net increase of 25% in the housing stock of Guildford Borough and is not justified when the official statisticians at the Office of National Statistics (ONS) are projecting a population increase of about 15% for Guildford Borough over this same period.

I OBJECT to policy S2

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1160  Respondent: 15368577 / A.L. Miller  Agent:

I would Just like you to know that I STRONGLY OBJECT:

To take away our Green Belt in Send

To the Green Belt being built on at Send, Garlick Arch, Send Hill and Clockburn Nurseries as I was told we would have the Green Belt Permanently that is why I bought our Bungalow in Send so we all can enjoy it.

To the amount of housing that is needed 13,860 with this amount needed you would have to use the Green belt I say NO

To ALL in Send and Surrounding areas why can you not use the Brownfield area around Guildford. Not in Send
Also to the interchanging onto the A3 at Burnt Common as we have a lot of traffic now. So with this we would be at a standstill and make Send like a car park in the Rush Hour. Also Send would be used as a cut through to the A3 and M25 also the A247. Why cant you use Slyfield for the industrial space

To the site of Garlicks Arch which is known for flooding in the area

To the 45 houses at Chockbarn. How are we able to take the traffic through tannery lane as it is to narrow. this road would not take the extra traffic

I object to this site on Send Hill as it has a lot of Green Belt and it is an area of Beautiful Countryside also it was used for land fill years ago and I know there was unsafe waste put in this site. Also to have 2 travellers pitches included there is insufficient access to this and will also encourage more travellers to park themselves on this site. NOT HAPPY

The GBC has not identified the sufficient Brownfield sites around Guildford, Send, Wisley, Horsley. This will destroy the open amenities of teh Greenbelt also the A3 will end up Gridlocked and the surrounding areas, they are Bad Now so what would happen with all the extra traffic. I wish to breath in FRESH AIR NOT FUMES FROM THE EXTRA TRAFFIC

To the inadequate requirements for the infrastructure of our Village. How will the schools and doctors cope with all this extra traffic.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. APPENDIX C

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1169  Respondent: 15368993 / Tessa Spink  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

2. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as well as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as well as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

3. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The "objectively assessed need" figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to:
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. POLICY A25 - Gosden Hill Farm

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  - Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 June 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).
The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPS16/2153  Respondent: 15368993 / Tessa Spink  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY A43 AND A43a – Garlick’s Arch

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.
GARLICK’S ARCH has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brownfield site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition of north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY D3

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4549  Respondent: 15368993 / Tessa Spink  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY D3

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4551  Respondent: 15368993 / Tessa Spink  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. POLICY D4

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4535  Respondent: 15368993 / Tessa Spink  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E1

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.
1. **POLICY E2**

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/4536  **Respondent:** 15368993 / Tessa Spink  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. **POLICY E5**

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/4553  **Respondent:** 15368993 / Tessa Spink  **Agent:**  

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

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1. **POLICY E6**

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4548  Respondent: 15368993 / Tessa Spink  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E7

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H1

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students are accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H2

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4552   Respondent: 15368993 / Tessa Spink   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H3

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.
The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being “closely related”. In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. POLICY I1

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/4542</th>
<th>Respondent:</th>
<th>15368993 / Tessa Spink</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

1. **POLICY I2**

   I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

   I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

   Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

   There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

   **What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
1. POLICY I3

I object to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1. POLICY P2

I object to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.
The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even if exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt sites proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called 'strategic sites' of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires
there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4554  Respondent: 15368993 / Tessa Spink  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. SITES - POLICIES A1 TO A57

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

   1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4533  Respondent: 15368993 / Tessa Spink  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
1. POLICY P4

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4528  Respondent: 15368993 / Tessa Spink  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Re: Responses to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

It seems to me that the plan is draconian in approach, whilst failing to absorb the previous genuine concerns of local residents regarding infrastructure and traffic problems. Furthermore, the plan seems to assume the annexation of Green Belt, contrary to Governmental stipulations.
1. POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick`s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.
The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brownfield sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Questions posed by Guildford Borough Council as part of its consultation.

24.A. Question 1: The evidence base and submission documents

The Proposed Submission Local Plan: strategy and sites is based on up-to-date evidence. The evidence base documents contributing to the preparation of the plan are listed in Appendix D and can be found on our website (links open in a new window).

Do you agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant?

ANSWER

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

24.B. Question 2: Legal Compliance

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole is legally compliant? Please provide the following information being as precise as possible:

- why you consider it is or is not legally compliant and
- what change(s) (if any) you consider necessary to make it legally compliant, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/817 Respondent: 15368993 / Tessa Spink Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

24.C. Question 3: Soundness

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound? Please provide the following information being as precise as possible:

- why you consider it is or is not sound and
- what change(s) (if any) you consider necessary to make it sound, explaining why this is the case.

ANSWER
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan reject any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.

3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford’s circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites— which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.

2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

5. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation

6. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation

7. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound

8. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018

9. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars

10. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham

11. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework

12. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.

13. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and
foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.

11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councillors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: SQLP16/818</th>
<th>Respondent: 15368993 / Tessa Spink</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate</td>
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24.D. Question 4: Duty to cooperate

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate? Please provide the following information being as precise as possible:

• why you consider it has or has not complied with the Duty to cooperate and
• what change(s) (if any) you consider necessary to make it comply with the duty to cooperate, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.
The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp172/4665  **Respondent:** 15368993 / Tessa Spink  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4666  Respondent: 15368993 / Tessa Spink  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.
11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to...
considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4667  Respondent: 15368993 / Tessa Spink  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.
9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/3107  
Respondent: 15368993 / Tessa Spink  
Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp17q/619  
Respondent: 15368993 / Tessa Spink  
Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/2157  **Respondent:** 15369185 / Keith, S. Jane and Natasha Liddell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

1. Summary

Since delivery of the 2014 Draft Local Plan, a new strategic site (designated A46) has been created between Normandy and Flexford in a Green Belt area of high sensitivity (a red area) and brought forward for development within proposed Submission Local Plan: strategy and sites (“the draft Local Plan”) covering the period to 2033; this site having previously been safeguarded for future development in the 2014 Draft Local Plan. This change from “Safeguarding” to “strategic site for development” has been done without any further consultation and is included in the draft Local Plan with a rushed manner, with minimal justification and virtually no objective infrastructure planning and costing.

At a meeting of Guildford Borough Council held on 24 May 2016 the Council resolved inter alia:

(1) That the draft Local Plan: strategy and sites document, as submitted to the Council, be approved for formal public consultation for a period of six weeks beginning 6 June 2016, subject to the following proviso:

As strategic site allocation A46, Land to the south of Normandy and north of Flexford, is a land parcel coloured red on the Green Belt sensitivity map and is only included as a strategic site to support the provision of a new secondary school, this strategic site allocation be deleted should it be demonstrated that provision of such a school within this site is not required.

The document Guildford Draft Local Plan: Education Review, May 2016, (“LP:ER”) is contained within the draft Local Plan, and suggests the provision of an 8FE secondary school at site A46 (SED3 of the draft Local Plan Part 3:Appendix C “SED3”). This proposed secondary school is contained within site A46 conceptual plans submitted to GBC by the aspirant developer Taylor Wimpey plc as part of their response to the 2014 Draft Local Plan. The LP:ER also proposed two other new secondary schools in other locations within the Borough totalling a further 8FE.

The LP:ER calls for only 5FE new secondary places required within the Borough above “that already planned” in the period to 2025 as a result of new dwellings to be built to then. It also states “beyond 2025 there is likely to be a further need for secondary places – potentially up to a further 5FE”.

---
2. Our Objection and Submission

We object to the inclusion of site A46 in the Local Plan.

We submit that the requirement for provision of a new secondary school within site A46 is not demonstrated in the draft Local Plan and its accompanying evidence base and therefore the allocation of site A46 should be deleted from the Local Plan in accordance with the proviso attached to Resolution 1 of the 24 May 2016 GBC meeting.

In fact, the evidence base in the draft Local Plan shows that a secondary school at Site A46 is NOT required.

3. QUESTION 1 – The Evidence Base and Submission Documents.

We do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites, as it relates to site A46 and the need for a new secondary school at that site, is adequate, up-to-date and relevant.

Our reasoning, using the Evidence Base, is given as follows.

3.1 Provision of Education in Surrey

The responsibility for provision of Education in Surrey lies with Surrey County Council, not GBC. SCC annually produces a report, the latest being the Schools Organisation Plan December 2015 (“SOP”). The SOP has a 10 year outlook, and does not call for a new secondary school requirement within this timeframe; therefore SCC in the SOP, as informed by the 2014 draft Local Plan and its inherent new housing plan, is not calling for building of a new secondary school in Guildford Borough in the period to 2025.

In terms of school sustainability and operating efficiency, SCC states that schools have to operate full or nearly (95%) full, and that any schools with more that 25% surplus places will be viewed by SCC as educationally and financially unsustainable; where possible SCC seeks to take action early to ensure that schools do not reach this point of unsustainability. Furthermore, SCC prefers to see existing schools expand rather than develop new schools, since this is a more efficient and sustainable use of infrastructural, economic and human capital.

Also, SCC state that, to be sustainable, a new secondary school has to have a minimum of 6FE. The two other new secondary schools at strategic sites Wisley and Gosden Hill are proposed in the LP:ER to be 4FE, which would be below the SCC threshold of sustainability, since both of these schools are in areas of higher population density and are sustainable strategic sites it is evident that these schools should be increased in size to 6FE each, should it not be proven that existing schools cannot be expanded to meet any future needs.

3.2 Proposed development does not require an 8FE secondary school

The proposed development of 1,100 dwellings on site A46 would result in a secondary school requirement of one Form of Entry (30 places) (Source LP:ER). Therefore the proposed A46 development does not, in itself, require provision of an 8FE secondary school at the site.

3.3 Proposed new secondary school at Site A46 is in wrong location

Site A46 in the Normandy ward is located in a sparsely populated area of the borough (Refer to the housing density map contained in the LP:ER, below), therefore is situated remotely from potential pupils, causing unsustainable travel requirements to fill the school places sufficiently to achieve and maintain school sustainability required by SCC. The justification for the school made in SED3 is that is serves the surrounding area, however the on the Evidence Base contained in the draft Local Plan, Normandy and the surrounding area does not need a secondary school.

[IMAGE 1]

3.4 Local Plan itself shows a secondary school is not needed at A46

According to the LP:ER, Site A46 is located in a ward that does not need additional education provision at all during the life of the Draft Plan, and is immediately adjacent to wards that either also do not need additional education provision over...
the life of the plan, or are only affected in the first 5 years of the plan i.e. before a secondary school could be built. Area 46 is distant from the wards that are affected over the whole life of plan (refer to map below reproduced from the LP:ER). Therefore location of a secondary school at A46 is unsustainable according to both SCC and GBC principles.

Pupils in Ash South and Tongham and Ash Vale also avail themselves of Secondary Schools in Hampshire (Farnham and Aldershot) further reducing need for a new secondary school in Normandy.

3.5 Declining birth rate in Guildford

The birth rate in Guildford is declining, reducing the future need for school places.

3.6 Existing secondary school capacity exists

Representations have been made by the head teachers of various Secondary Schools to the 2014 Draft Plan and to GBC and SCC, stating that they have existing capacity to take new pupils, and that they also have space and infrastructure to permanently expand. This is in accordance with SCC’s school sustainability policy of using under-utilised existing capacity and of expanding existing schools in preference to developing new schools.

3.7 Migration to UK to decline

Following the Brexit vote, government and commentators agree that migration into the UK will decline significantly once the UK exits the EU. This will naturally reduce the demand for housing and education within Guildford Borough, further negating the justification for a new Secondary School at site A46 at Normandy/Flexford.

3.8 A new secondary school at site A46 is unsustainable.

A new secondary school at Normandy is not sustainable on many levels, some being:

- It is not demonstrated that there will be sufficient pupils from the surrounding area to maintain 95% capacity.
- The site is in a sparsely populated area of the B
- The Local Plan shows that Normandy is a ward that does not need additional secondary school provision over the life of the PI
- If any extra secondary provision is needed, it is to the east or north, not west of the borough.
- Road transport infrastructure to the site has limited capacity without major changes to infrastructure.
- The site destroys greenbelt, ancient woodland, vulnerable habitats, impinges on listed buildings and is located on an area of important drainage for flood mitigation.
- Heavy clay soils will give rise to unusable playing and sports fields.

We note that the Sustainability Appraisal of the Guildford Borough Local Plan, June 2016 (“SA”) does not deal with education sustainability nor considers the sustainability of transport and infrastructure requirements arising from education needs arising from the draft Local Plan. In respect of education, the SA merely makes some high level, self-serving and unsubstantiated comments with regard to spatial strategy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Summary

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2. Our Objection and Submission

We object to the inclusion of site A46 in the Local Plan.

We submit that the requirement for provision of a new secondary school at site A46 is NOT required.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Also, SCC state that, to be sustainable, a new secondary school has to have a minimum of 6FE. The two other new secondary schools at strategic sites Wisley and Gosden Hill are proposed in the LP:ER to be 4FE, which would be below the SCC threshold of sustainability, since both of these schools are in areas of higher population density and are sustainable strategic sites it is evident that these schools should be increased in size to 6FE each, should it not be proven that existing schools cannot be expanded to meet any future needs.

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is distant from the wards that are affected over the whole life of plan (refer to map below reproduced from the LP:ER). Therefore location of a secondary school at A46 is unsustainable according to both SCC and GBC principles.

Pupils in Ash South and Tongham and Ash Vale also avail themselves of Secondary Schools in Hampshire (Farnham and Aldershot) further reducing need for a new secondary school in Normandy.

[IMAGE 2]

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[IMAGE 3]

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Representations have been made by the head teachers of various Secondary Schools to the 2014 Draft Plan and to GBC and SCC, stating that they have existing capacity to take new pupils, and that they also have space and infrastructure to permanently expand. This is in accordance with SCC’s school sustainability policy of using under-utilised existing capacity and of expanding existing schools in preference to developing new schools.

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- The Local Plan shows that Normandy is a ward that does not need additional secondary school provision over the life of the Plan.
- If any extra secondary provision is needed, it is to the east or north, not west of the borough.
- Road transport infrastructure to the site has limited capacity without major changes to infrastructure.
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- Heavy clay soils will give rise to unusable playing and sports fields.

We note that the Sustainability Appraisal of the Guildford Borough Local Plan, June 2016 (“SA”) does not deal with education sustainability nor considers the sustainability of transport and infrastructure requirements arising from education needs arising from the draft Local Plan. In respect of education, the SA merely makes some high level, self-serving and unsubstantiated comments with regard to spatial strategy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

- [IMAGE 3.png](image3.png) (387 KB)
- [IMAGE 1.png](image1.png) (2.2 MB)
- [IMAGE 2.png](image2.png) (3.2 MB)

Comment ID: SQLP16/897  Respondent: 15369185 / Keith, S. Jane and Natasha Liddell  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance
<table>
<thead>
<tr>
<th>Question 2: Legal Compliance</th>
</tr>
</thead>
<tbody>
<tr>
<td>We do not feel sufficiently qualified to comment on whether the Local Plan is legally compliant.</td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
</tr>
<tr>
<td>Attached documents:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Question 3: Soundness</th>
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</thead>
<tbody>
<tr>
<td>We do not consider the Proposed Submission Local Plan: strategy and sites 2016 is sound as it relates to site A46 and the need for a secondary school to be located at that site. Our reasoning is given above, and furthermore we do not believe it conforms to the National Policy Planning Framework guidance for soundness. We make our comments below the guidance notes of the NPPF (which are in italics).</td>
</tr>
</tbody>
</table>

To be sound, a plan should be:

- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;

Our comment: The strategy to justify a secondary school at site A46 has not been objectively assessed. The justification made in the LR:ER, SED3 and Evidence Base is subjective and does not draw in specifically from the SCC and other neighbouring county councils that provision education. The siting of an 8FE new school in a development that only directly feeds in 1FE and is in a sparsely populated area of the Borough is not sustainable according to SCC education guidelines. Therefore the site A46 plan is not positively prepared.

- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;

Our comment: The evidence base presented for siting of a new secondary school on a red area of greenbelt shows that the plan is not the most appropriate strategy, and in fact shows that a secondary school at A46 is not required. It is the least appropriate strategy from a site selection basis. If the housing and school provisioning requirements ultimately show need for new secondary schools the more reasonable alternatives would be to provision any new schools at Wisley and Gosden Hill as 6FE schools to meet SCC sustainability guidelines.
• **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and

Our comment: The evidence base does not even show how the school at site A46 is deliverable. It makes an estimated capital cost of £22m with no justification of the cost or how it is to be funded apart from a comment of “developer contributions”. Similarly the designs and costs for associated infrastructure are mere “thumb sucks” and vague “funded by developer” comments. There is no evidence within the draft Local Plan of effective joint working on cross-border strategic priorities with regards to this matter. Therefore the plan is **not** effective.

• **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

Our Comment: The plan does not enable the delivery of sustainable development from the perspective of education (which is not even considered in the SA), infrastructure, road transport, environment and habitats and most importantly the conflicts with the wishes of the communities at Normandy and Flexford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** SQLP16/821  **Respondent:** 15369185 / Keith, S. Jane and Natasha Liddell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

5. **QUESTION 4: Duty to cooperate**

We do **not** consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to Cooperate and particularly with regards to the provision with a new 8FE secondary school at site A46.

Section 20(5) (c) of the Planning and Compulsory Purchase Act 2004 (as amended) and paragraphs 178-181 of the National Planning Policy Framework create a duty on all local planning authorities and other bodies to cooperate with each other to address strategic issues in the preparation of the Local Plan. The body of evidence in the draft Local Plan does not provide objective information regarding co-operation with stakeholders, such as SCC, education professionals, communities and infrastructure providers to develop and demonstrate the need for a school at A46.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** SQLP16/900  **Respondent:** 15369185 / Keith, S. Jane and Natasha Liddell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/1183</th>
<th>Respondent: 15370497 / Edward Scott</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
<td></td>
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<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>6. QUESTION 5: Examination</td>
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<tr>
<td>We wish to express an interest in participating at the Examination as it relates to site A46. We are directly affected by the potential development of this site which is located directly across Westwood Lane and wish to directly present our objections.</td>
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<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Attached documents:</td>
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<tr>
<td>Comment ID: PSLPA16/1184</td>
<td>Respondent: 15370497 / Edward Scott</td>
<td>Agent:</td>
</tr>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>15. I object to the proposed Infrastructure Schedule (Appendix C)</td>
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<tr>
<td>The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick's Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.</td>
<td></td>
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<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<tr>
<td>Attached documents:</td>
<td></td>
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</tbody>
</table>
16. I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan's proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2169  Respondent: 15370497 / Edward Scott  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

13. I object to the inclusion of the land at Garlick's Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick's Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy 13).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy 03).
The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy 14)

It is clear that with this site being added at the 11th hour no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy 11)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

14. I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of 'through' traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through Glandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
8. I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3). I object to the local plan based on the impact it will have on the special countryside of the borough. The proposed development at Garlick's Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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5. I object to the sustainable employment policy (Policy E1). If developed, the new employment site at Garlick's Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick's Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick's Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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6. I object to the location for new employment floorspace at Garlick's Arch Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick's Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

7. I object to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
9. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1).

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Glandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

With some 5000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4606  Respondent: 15370497 / Edward Scott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

10. I object to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick's Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, I (and other residents) will see our quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.
Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

11. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy 12)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

12. I object to poor air quality concerns (Policy 13)

Paragraph 4.6.27 of the Plan states that "Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health." The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and our health.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

2194
3. I object to not protecting the Green Belt (Policy P2)

I object to the proposals to remove the villages of Ripley, Send and Glandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick's Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

4. I object to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.
The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough's identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick's Arch (A43) is identified on the Environment Agency's flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council's SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding.

Knowing the area well because I live alongside it, I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be recommissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4594  Respondent: 15370497 / Edward Scott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the Local Plan as the development proposed will not be sustainable (Policy S1)

I had believed that the purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over development, particularly for the villages between Guildford and the M25, including Ripley, Send and Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35) and Garlick's Arch (A43) are in unsustainable locations. We do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on cars. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. I know this as I have to use them daily. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
2. I object to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill (Glandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Glandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, we are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities. On MY community!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to lack of immediate provision for new schools
I OBJECT to lack of immediate provision for doctors surgeries

I respectfully request that this email in full be shown to the Planning Inspector prior to any decision making.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2163  Respondent: 15370529 / J Wells  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2. I OBJECT to building 45 houses at Clockbarn Nursery in Tannery Lane will cause more traffic problems and a great deal more lorries & cars will be using the existing lane; also the building of a Marina will cause great problems and be very dangerous. The junctions are already taking a high volume of traffic and are known locally to be dangerous; adding extra vehicles to this including boats on trailers, etc will only serve to exacerbate these issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2164  Respondent: 15370529 / J Wells  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to 400 houses and 7000 sq metres of industrial space being built at Garlick's

This will create frequent gridlock due to the extra vehicles. Also when there is a problem/crash or excessive rainfall the Ripley Bypass is often closed and traffic is sent through Send and Ripley - creating miles of traffic queues in all directions. The pointless destruction of ancient woodlands would make the pollution in this area far greater than the problems that already exist. The accurate calculations for housing have not been released, therefore this is unjustifiable and unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

5. I OBJECT to the new interchange with the A3 at Burnt. The traffic from the proposed 2000 new houses at Wisley Airfield, 2000 houses at Gosden Hill, Birtsham & 1850 at Blackwell Farm (total of 5850 across the three sites) will be using Send Road, Send and will cause gridlock as already this road is overloaded. The noise & pollution, already excessive, would worsen to untenable levels and must be avoided at all cost.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4. I OBJECT to the development of 40 houses and 2 travellers' pitches on Send. This inappropriate development would cause no end of traffic problems as the narrow single width road is insufficient access. The subsoil of the proposed site is a documented unsafe landfill with GBC. Again the beautiful countryside would be damaged, also additional pollution issues would be created. This is currently an area of outstanding natural beauty.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
With regard to the 2016 Draft Local Plan:

1. I OBJECT to Send Village being removed from the permanent green belt, as intended by the National Planning Policy. There are no special circumstances to justify removing Send from the Green Belt as originally elected by local councillors & central government. This is reneging on a clear election promise, which is unacceptable. We do not wish to be part of a conurbation and value our village status. Developers will be taking advantage to over-populate the village, very quickly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLP16/4599  Respondent: 15370529 / J Wells  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In conclusion:

I OBJECT to the 2016 Draft Local Plan

I OBJECT to so many developments in the Send & Ripley area

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/828  Respondent: 15370529 / J Wells  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the limited consultation period

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### APPENDIX C

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

2. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

3. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it...
cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1. APPENDIX D

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1188  Respondent: 15370593 / A Gee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Comment ID: PSLPS16/2171  Respondent: 15370593 / A Gee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY A25 - Gosden Hill Farm

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 – 2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).
The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. POLICY A43 AND A43a – Garlick’s Arch

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.
Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY D3

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4622  Respondent: 15370593 / A Gee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY D3

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4623  Respondent: 15370593 / A Gee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. **POLICY D4**

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: PSLPP16/4611  Respondent: 15370593 / A Gee  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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1. **POLICY E1**

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.
I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. **POLICY E5**

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/4625  **Respondent:** 15370593 / A Gee  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

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1. **POLICY E6**

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/4621  **Respondent:** 15370593 / A Gee  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

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1. **POLICY E7**

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H2

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4624  Respondent: 15370593 / A Gee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H3

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.
The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses through all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/4616  **Respondent:** 15370593 / A Gee  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ( )
1. **POLICY I1**

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

1. POLICY I3

I OBJECT to poor air quality concerns (Policy I3)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.
The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires
there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a 'special circumstance') to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/4626  **Respondent:** 15370593 / A Gee  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

1. **SITES - POLICIES A1 TO A57**

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. **The plan says that “allocating these sites does not grant planning permission for development.”** However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/4609  **Respondent:** 15370593 / A Gee  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Re: Responses to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

1. POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)
The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<tr>
<th>Comment ID: PSLPP16/4607</th>
<th>Respondent: 15370593 / A Gee</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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1. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these
adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN Ire not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Questions posed by Guildford Borough Council as part of its consultation.

Questions from GBC

24.A. Question 1: The evidence base and submission documents

The Proposed Submission Local Plan: strategy and sites is based on up-to-date evidence. The evidence base documents contributing to the preparation of the plan are listed in Appendix D and can be found on our website (links open in a new window).

Do you agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant?

ANSWER

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up-to-date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
24.B. Question 2: Legal Compliance

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant? Please provide the following information being as precise as possible:

• why you consider it is or is not legally compliant and
• what change(s) (if any) you consider necessary to make it legally compliant, explaining why this is the case.

**ANSWER**

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites-which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and
foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.

11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councillors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: SQLP16/832</th>
<th>Respondent: 15370593 / A Gee</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate</td>
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**24.D. Question 4: Duty to cooperate**

Do you consider the Proposed Submission Local Plan: strategy and sites **as a whole** has complied with the Duty to cooperate? Please provide the following information being as precise as possible:

- why you consider it has or has not complied with the Duty to cooperate and
- what change(s) (if any) you consider necessary to make it comply with the duty to cooperate, explaining why this is the case.

**ANSWER**

I do not consider the Proposed Submission Local Plan: strategy and sites **as a whole** has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.
The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: PSLPS16/2174  Respondent: 15370689 / C.E. Phillips  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

5. I OBJECT to the inclusion of the land for new on/off ramps at BurntCommon.

The addition of a new on/off ramps to the A3 at Burnt Common would be a disaster in the making. There is no requirement to access the A3 in this location.

Any new A3 access/exit could be at the Ripley end of the A247. The existing on/off ramps could be upgraded to make two more ramps, one to exit the A3 North bound the other to access the A3 South bound. This addition will increase the flow of traffic through both Send and Ripley, which are both suffering from traffic congestion or Upgrade the A3100 Clay Lane access at Burpham.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: PSLPS16/2173  Respondent: 15370689 / C.E. Phillips  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

| 1.  | I OBJECT to the development of Send Hill. |

I object to the proposal in the Local Plan on the grounds that a Wasteland Solutions environmental report on Send Hill dated March 2004 gave evidence of past ponding of water in the excavated area. Further development would disturb water table and increase the risk flooding to nearby properties.

The proposed site was used by GBC as a landfill site (and not a quarry as stated elsewhere) and on ordnance survey maps it is marked as "refuse and slag heap". Any disturbance to the site would be a health hazard due to the unknown materials. It is therefore unsuitable for such a development due to health reasons.

Since July 2000, GBC installed Gas Monitoring wells. One well recording methane gas discharge. A recent newspaper article on how the dangers of living near landfill sites raises cancer concerns. Send Hill is a single track country lane and too narrow to provide sufficient access to the site or accommodate the potential new levels of traffic the proposed development would bring.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<tr>
<th>Comment ID: PSLPP16/4638</th>
<th>Respondent: 15370689 / C.E. Phillips</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

| 4.  | I OBJECT to the lack of proper infrastructure planning for sites. |

I object to lack of infrastructure for the sites in and around Send. Many of the utilities in the area are at or very close to there maximum capacity, such as the electrical network and main drainage/sewers. No plans to improve these services should mean no developments in this village. The local Send Medical Centre is now operating at full capacity, are they any plans to increase this service?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Respondent: 15370689 / C.E. Phillips</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2. I OBJECT to not protecting the Green Belt

I object to the proposals to remove the villages of Send, Ripley and Glandon from the Green Belt together with the sites of Wisley Airfield and Garicks Arch. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered or the development of the Green Belt. There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. This is something that villagers from each village do not want to happen.

(Instead of developing Garicks Arch and Send Hill, there is a "brownfield" site just to the south of the Burnt Common roundabout with surplus land that could accommodate a further development)

In your recent free newspaper "About Guildford", you state that the Green Belt must be saved and to use all "brownfield" sites for development. So why doesn't the council abide by it's own statements?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4628  Respondent: 15370689 / C.E. Phillips  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the Local Plan as the development proposed will not be sustainable.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy. The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact over existing local communities by over development, particularly for the villages between Guildford and the M25, including Ripley, Send and Glandon. The infrastructure/services in these villages will be unable to cope with the level of development proposed and do not meet the needs of the local communities.

The sites of Wisley Airfield, Garlick's Arch, Send Hill and Tannery Lane are in unsustainable locations. They do not benefit from railway stations that are within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options but to be reliant on motor vehicles.

Greater consideration should be given to increasing the density of development in urban areas, such as "brownfield" sites in Guildford, where more practical sustainable transport options are available.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Housing Numbers** - There is no detailed evidence for the proposed number of housing. Numbers quoted are now double what they were despite potential reduction in estimated population due to reduced net migration following our EU exit. I therefore believe these calculations to be based on flawed data.

I object to how the Strategic Housing Market Assessment has been worked out. There is insufficient detail and it is 50% higher than average and therefore likely to be flawed.

The historic village of Burpham will completely lose its identity, and become part of a long corridor of urban sprawl along the A3 North bound towards London.

Truly affordable housing will never be built in this area. Any reference to such is flawed.

Please consider my strong objection to the proposals in the plan as stated above.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Other Basic Infrastructure** - There are no detailed plans for other essential infrastructure, power lines, sewerage, drainage, medical facilities, education and other transport options such as park and ride facility and rail station. The plan is again unsound.

The Royal Surrey County Hospital can barely cope with the population it serves now. There are no details as to how it will cope with potential 25% population increase. The Plan is again flawed and unsound.

**Other Basic Infrastructure continued** - The current water supply is barely sufficient for the current population as evident when Clandon House (built 1720s) burnt to a shell in April 2015 due to lack of water supply available to extinguish flames effectively. Currently the water supply for the Guildford area runs out in 4 hrs. The Plan is therefore unsound on this basis as it has no detail of how further supply would be achieved.

There is no capacity in the current sewerage system for expansion. The Plan is therefore unsound on this basis.
I object very strongly to Guildford Borough Council’s Draft Local Plan June 2016.

I believe it is inherently unsound and unsustainable due to lack of detail on basic infrastructure.

**Transport** - There is no detail on road networks. The current traffic flow problems in Guildford and surrounding areas are frequent and well documented. Until these are addressed in a sustainable manner it would be completely unsuitable to contemplate any large developments in the area. In particular a solution to the congestion on the A3 needs to be addressed ideally by building a tunnel which potentially could be bored in under a year (at 37 mtrs a day). A lesser alternative would be using 2 x 4 way intersections at Potters Lane, North of Guildford and at the Stoke Road/Ladymead junction. No new roads have been specifically identified in the Plan. It would be completely irresponsible and a waste of money to contemplate building even one house without having access, power & drainage to it assured. Some of the land identified for housing may be key to the development of essential infrastructure so the basics need planning first. Land may be required for a major road intersection etc. The possibility of an unsound decision in building an off slip at Garlick Arch may mean that in the future a 4 way interchange at Potters Lane is unfeasible. This off slip would also make no benefit in relieving the congestion through Burpham. I believe road network decisions, including the A3 will be decided by Highways England in 2020. Without decisions on this vital arterial road, further development within its proximity is unsound and unsustainable.

London Road through Burpham is planned to be a sustainable movement corridor but is likely to be congested by thousands more vehicles trying to negotiate to the South of town. I wonder if this road has ever been visited by the authors of the Draft Plan during a rush hour or when the A3 has one of its frequent hold ups. From the start of the south bound A3 slip road the traffic can often be queuing from around 4pm. Traffic moves at barely walking pace in both directions to and from Guildford town centre. The roundabout along London Road where it intersects with New Inn Lane and Burpham Lane is a particular bottleneck even at weekends. When there is a problem on the A3, Guildford and its surrounding villages often come to a virtual standstill.
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()


Evidence is expected to be up-to-date and relevant. However, the evidence that GBC presents is neither accurate nor up to date. In the Settlement Profiles document (2013) which is part of the Settlements Hierarchy referred to in the Evidence Base (Appendix D of the Plan) GBC state (page 49) "There is a Site of Nature Conservation Importance (SNCI) to the north of Normandy" whereas in fact there are 4/5 SNCIs to the north of Normandy (see Map 2, Appendix 1) namely: Withybed Copse and Henley Park Fields SNCI, Normandy Common SNCI, Wyke School Wood SNCI, and Wyke Churchyard SNCI, and arguably part of Wanborough and Normandy Woods SNCI. In addition to these, there are two others in Normandy Parish, namely Little Flexford SNCI and Broadstreet Common and Backside Common SNCI as well as the remainder of Wanborough and Normandy Woods SNCI. An eighth SNCI, Greencut Copse SNCI is outside Normandy Parish but within 2 km of Site A47.

We are of the opinion that the evidence is flawed and, had it been assessed correctly, A46 would not have been included in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1196   Respondent: 15371361 / Friends of Normandy Wildlife (Alistair Lawson)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Normandy and Flexford

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Objection to proposal to inset Normandy and Flexford from the Green Belt

We object to the insetting of Normandy and Flexford from the Green Belt on the grounds that these areas do contribute to 'openness of the Green Belt'.

According to the NPPF "the essential characteristics of Green Belts are their openness and their permanence". Paragraph 4.3.1.2 of the Plan (under Policy P2) states that "only those villages whose open character makes an important contribution to the Green Belt should be included in the Green Belt". We contend that the land in both Policy A46 and A47 makes an unparalleled contribution to the Green Belt which stretches from Guildford in the east to Ash/Tongham in the west. If this area is inset and built upon in the manner proposed it will be the beginning of urban sprawl across this stretch of countryside which Green Belt policy was designed to prevent. It will break up wildlife corridors and degrade habitats. The Government have indicated that Green Belt Is supposed to be protected, but GBC are trying to justify development in this area when they themselves designated it as having a 'Red' status under their system for quantifying sensitivity (red being the most sensitive and least likely to be developed). GBC have totally ignored all policies on Biodiversity when proposing to inset these areas.
New developments are supposed to maintain existing Green infrastructure and improve upon it; in order to secure sustainable development, there should be a net gain for biodiversity. It is impossible to agree that any Green infrastructure which would accompany this development could mitigate for the habitat loss and resultant decline of species.

According to the Council for Protection of Rural England (CPRE), 13% of the most important habitat areas identified in UK BAP occur in the Green Belt, and certain species such as the mistle thrush, song thrush and starling (known to use Site 46) are doing better in the Green Belt than in any other parts of England. Green Belt areas also show more positive trends of bird and butterfly species than in the urban fringes compared to them.

Removing large areas of the Green Belt cannot possibly be considered 'sustainable'. FNW totally oppose the Insetting of the Green Belt encompassing and surrounding Normandy and Flexford.

1. Concluding comments

It is evident from our knowledge of the proposed development site that the area covered by the Plan for Normandy and Flexford is of major importance for biodiversity and wildlife. Normandy Parish is one of the most wildlife rich districts in Guildford, comprising seven SNCIs, many additional UK BAP Priority sites, together with areas of ancient woodland. A significant part of the environmentally internationally important TBH SPA is within the Normandy Parish.

The natural environment in Normandy and Flexford will be irreparably damaged if replaced by houses with small gardens, schools, shops and playing fields. There will inevitably be a significant net loss of biodiversity, an impoverished natural environment and significantly reduced wildlife species in and around the area. Although the ancient woodlands will remain on site A46, their ecology will be in a degraded state due to damage to the trees and the life they support from roaming cats, dogs and people (by trampling, picking and uprooting plants, creating fires, foraging, light pollution, noise pollution, air pollution effects on lichens, fungi, invasions from gardens of non-native plants etc.) (see The Woodland Trust article specifically on this subject entitled: Impacts of nearby developments on ancient woodland -addendum by Luci Ryan, December 2012). Individual trees outside of the ancient woodlands could similarly be damaged.

A46 removes over 67ha of land rich in species of both animals and plants and offsets it with a SANG of probably 21ha, the minimum required. SANGS are for mixed use, and can never be as species rich as the land covered by A46, neither can small gardens and playing fields, so there would be a net loss of approximately 46ha of invaluable species rich land. There will be an additional loss of over 5ha from A47, making a total loss of species rich land in Normandy and Flexford of 52ha. The proximity of the housing development to the TBH SPA, and the size and likely condition of the proposed SANG, means that there will be an increase of dog walkers using the TBH SPA which will damage the fragile environment of this internationally important site and have a deleterious effect, particularly on rare ground nesting birds.

It is obvious that in putting forward this plan, GBC have completely ignored their own Policy 14 on the need to maintain Biodiversity and likewise ignored the NPPF and the UK BAP project with regard to biodiversity and habitat protection.

It is therefore our contention that the proposed development is unsustainable in that it does not meet the conditions set out in the NPPF (see 2.1 above). It contravenes the Framework in that the effect of Policies A46 and A47 will be to lead to the loss of irreplaceable habitats and decimation of populations of wildlife species.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The Friends of Normandy Wildlife (FNW) strongly object to the proposed development (sites A46 and A47) in Normandy and Flexford as set out in the Guildford Borough Council Proposed Submission Local Plan: Strategy and Sites, June 2016 (the Plan). Our Response comprises the following:

Background: The importance of Normandy and Flexford for biodiversity, nature conservation and wildlife.


Section 2: Conflict of the Plan with relevant national and local policies on biodiversity and the natural environment

Section 3: Deleterious effects of proposed development (Policies A46 and A47) on biodiversity, the natural environment and associated wildlife.

Section 4: Objection to proposal to inset Normandy and Flexford from the Green Belt

Section 5: Concluding comments

There are a number of nationally important sites for nature conservation within and adjoining the Parish of Normandy.

(i) Statutory Designated Sites

Normandy Parish includes a large part of Ash Ranges which form part of the Thames Basin Heaths Special Protection Area (TBH SPA; see Map 1, Appendix 1), a statutory designated site and designated for its rare and vulnerable birds, specifically nightjar, Dartford warbler and woodlark, under the EC Birds Directive. This site also forms part of the Thursley, Ash, Pirbright and Chobham Special Area of Conservation (SAC), a statutory designated site and designated for its North Atlantic wet heaths, European dry heaths and peat bogs.

Ash Ranges also form part of the Ash to Brookwood Heaths Site of Special Scientific Interest (SSSI), a statutory designated site and designated for its dry heathland, wet heathland and bog, bryophytes (mosses and lichens), invertebrates (such as the scarce bog bush cricket), birds (such as hobby, stonechat, yellowhammer, reed bunting, tree pipit, meadow pipit and the previously mentioned SPA bird species), and reptiles (all six native species including the European Protected Species sand lizard and smooth snake).

(ii) Non-Statutory Designated Sites

Within a radius of 2 km from site A47 there are eight non-statutory designated sites (see Map 2, Appendix 1). These sites are known as Sites of Nature Conservation Importance (SNCIs) and are identified on account of the habitats and flora/fauna they support. They are of County or regional wildlife importance.

(iii) Ancient Woodland

Ancient woodland is defined by Natural England as a site that has had a continuous woodland cover since at least 1600 AD. It is an irreplaceable, wildlife-rich habitat known to support more biodiversity than any other UK land habitat, and often includes important archaeological features.
The proposed development site contains several areas of ancient woodland (see Map 3, Appendix 1). The two main areas in or bordering site A46 in the Plan are Pussey's and Walden's Copses. In addition, there are two smaller areas, the offset East-West trending belt of woodland West of Pussey's Copse and the smaller North-South trending belt south of Walden's Copse. This woodland is clearly ancient (as identified from associated flora such as primroses, bluebells, wood anemones and early purple orchids), but is not included in the Ancient Woodland Inventory because it is slightly under the minimum registration size of two hectares. Nevertheless, we believe that this valuable and irreplaceable woodland should be treated as if it was protected and therefore be left intact. The current developer plan shows a road bisecting this woodland; if implemented it would destroy a precious green corridor.

There is an avenue of old oaks towards the centre of the footpath that crosses the site, which are registered on the Ancient Tree Inventory, and other individual trees on the site which the Woodland Trust regards as valuable in terms of conservation.

- Other Habitats of Importance

There are a number of other habitats of importance within the Parish which are important to biodiversity and enhance the natural beauty of the area.

- Hedgerows

Hedgerows surround many of the fields within the Parish. These are important habitats for nesting and foraging birds, small mammals including dormice, amphibians and reptiles, and many invertebrates and plants. They also function as green corridors for wildlife.

- Traditional Orchards

Traditional orchards (see Appendix 2) are also present within the Parish which are all Priority Habitats. The Normandy Traditional Community Orchard is home to a number of species and some of these are Notable Rare or Scarce species.

- Ponds and Streams

A number of important wetland habitats are located within the Parish. Two of these ponds (Normandy Pond and Little Flexford Flax Pond) have been designated as Sites of Nature Conservation Importance. The Flax Pond and stream at Little Flexford have records of water voles (UK's fastest declining mammal species), and the Flax Pond has anecdotal records of great crested newts (European Protected Species).

The stream and Normandy Pond on Normandy Common have records of water voles and Normandy Pond in particular has records of several dragonfly species. There are anecdotal records of great crested newts present on Normandy Common, particularly in the wooded areas near to Normandy Pond.

Some large ponds also occur in the region of Little Flexford. These are home to many species of waterfowl, as well as providing breeding sites for common frogs and toads and foraging sites for grass snakes.

- Fauna and flora present on land between Normandy and Flexford (re Policy A46)

The investigations of the proposed site by FNW were unfortunately limited since our only permitted access was the footpath across the site. Despite this restriction, we have been able to show that the area is rich in species, especially bird species. Had we had greater access and a more prolonged time period over which to monitor the area, we are confident that, given the nature of the habitats, many more species would have been identified.

- Birds

Birds offer our best guide to the presence of species of conservation concern because they can be heard from a distance and they are likely to be seen flying around the general area. Site A46 falls within 4 one kilometre grid squares (SU9250, SU9350, SU9251 and SU9351) which combine to form a tetrad. From our group's records and those of BirdTrack (a collaborative online recording package from the British Trust for Ornithology, RSPB and Birdwatch Ireland) we find that 15 Red listed birds, have been recorded from the A46 tetrad. A full listing can be seen in Appendix 3. Additional birds
such as lapwing, feldfare, grey wagtail, marsh tit and lesser-spotted woodpecker, which are likely to be present given the nature of the habitats, would increase this figure to twenty. In addition, another 18 species occurring on the Amber list (BoCC4) have been recorded from the tetrad. BoCC4, has been compiled by the UK’s leading bird conservation organisations and they state that there are more birds on the Red List that occur in woodland (e.g. woodcock, nightingale) than in any other habitat and that farmland birds (e.g. lapwing, grey partridge, redwing, fieldfare, skylark) are still a major concern. The woodland and agricultural land in Normandy Parish therefore provides a key area for endangered species.

- Amphibians

Amphibians are considered to act as good barometers of the overall health of the environment and are protected species. All of the UK amphibian species have been recorded (based on the Surrey Amphibian and Reptile Group (SARG) Interactive Atlas) in the A46 tetrad with the exception of the most threatened and European protected species, natterjack toad and great crested newt. However, the latter species has been recorded in the tetrads to the South and East and so could be present.

- Reptiles

All UK species of reptiles except for the rare smooth snake and sand lizard have been recorded in the A46 Tetrad (SARG Interactive Atlas).

- Hazel dormice (dormice) and water vole

Dormice and water voles are considered by FNW to be potentially present in the area. A local person living near the A46 site has reportedly seen the fully protected dormice using a box in their garden and, since these animals are known to occupy ancient woodland more frequently than recent woodland, we feel that there is every chance they are present on site A46, but as stated above, our investigations have been limited.

According to Surrey Wildlife Trust water voles have suffered one of the most catastrophic declines of any British mammal and, as mentioned above, have been recorded at Little Flexford in the past. Since their home territories extend linearly along the banks of streams, there is still a possibility that a population exists undetected on private land in upstream or downstream locations, or even on tributaries on site A46. It is imperative that their habitat is reained and not disturbed.

- Other sensitive species

A sensitive species seen in the A46 tetrad is the white admiral butterfly (UK Biodiversity Action Plan priority species). This occurs in woodland areas and along with the purple emperor (Butterfly Conservation 2010 Red list: near-threatened) is likely to be found in site A46. The seriously threatened stag beetle (a BAP priority species and protected in the UK) is a Normandy speciality and has been seen recently in Glaziers Lane and the Guildford Road (North of site A46) amongst other areas.

  - More common species

Pipistrelle bats are relatively common, as are roe deer. There are many of the common species of birds, for example, blue tit, great tit and magpie; butterflies such as orange tip, brimstone, red admiral and peacock; and plants including meadow vetchling, red clover, white clover, early purple orchid and wood sorrel.

One of the most influential figures in nature conservation, Sir Norman Winfrid Moore, stated ”It cannot be said too often that it is as much a conservationist's job to keep common species common as it is to ensure the survival of rare species”. We fully endorse this statement and believe it should be applied throughout Normandy and Flexford.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [IMAGE 1.jpg](187 KB) [IMAGE 2.jpg](120 KB) [IMAGE 3.jpg](143 KB)

Comment ID: PSLPS16/2189  Respondent: 15371361 / Friends of Normandy Wildlife (Alistair Lawson)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2. Conflict of the Plan with relevant national and local policies on biodiversity and the natural environment

The national and local policies on biodiversity and the natural environment listed below all make strong statements about the need to minimise the Impact of development on biodiversity and to conserve the natural environment.

It Is clear that the proposals for development In Normandy and Flexford directly conflict with these policies and we object to these development proposals as GBC have failed to show how they will conserve and enhance biodiversity.

2.1 The National Planning Policy Framework

The National Planning Policy Framework (NPPF) states that "The purpose of planning is to help to achieve sustainable development" and it describes three "dimensions" relevant to this aim: economic, social and environmental. The explanation for how the environmental aspect plays a role includes the statement ".....helping to improve biodiversity, use natural resources prudently ....." (see point 7 of the section in the NPPF dealing with achieving sustainable development).

In section 11 headed "Conserving and enhancing the natural environment", it is stated inter alia that planning policy should protect and enhance valued landscapes and minimise impacts on biodiversity, providing net gains in biodiversity wherever possible to halt the overall decline in biodiversity, by promoting "the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations .....".

2.2 Guildford Borough Council

Guildford Borough Council (GBC) interprets the NPPF through their 'Policy 14' which emphasises the commitment to biodiversity stating: "The Council will conserve and enhance biodiversity and will seek opportunities for habitat restoration and creation, particularly within and adjacent to Biodiversity Opportunity Areas (BOAs) "

Proposals for development must demonstrate how they will deliver appropriate net gains in biodiversity. Where proposals fall within or adjacent to a BOA, biodiversity measures should support that BOA's objectives. The Supplementary Planning Document (SPD) will set out guidance on how this can be achieved. European sites designated as Special Protection Areas (SPAs) and Special Areas of Conservation (SACs), National Sites of Special Scientific Interest (SSSIs), local SNCIs and Local Nature Reserves are all shown on the Policies Map or as subsequently updated.
Policy 14 goes on to say that "Permission will not be granted for proposals that are likely to materially harm the nature conservation interests of local sites unless clear justification is provided that the need for development clearly outweighs the impact on biodiversity."

2.3 The UK Biodiversity Action Plan

The UK Biodiversity Action Plan (UK BAP) describes the UK's biological resources. In Surrey, recognised priority habitats include lowland dry acid grassland, lowland meadows, flood plain grazing marsh, wet woodland, hedgerows, and arable field margins. It is known that farmland offers important habitat for wildlife. The UK BAP also identifies priority species for conservation, which include rare and also declining "species of mammals, birds, reptiles, amphibians, fish, plants, mosses, lichens and fungi". Examples of priority species in Surrey include farmland birds which should be protected from further decline by maintaining and enhancing current populations wherever possible. As it says: "Development could impact on these species by direct loss of habitat, but also through increased recreational disturbance; especially associated with residential developments."

The proposed area for development in Normandy and Flexford encompasses many of the above biological resources, recognised priority habitats, and priority species for conservation. It is also relevant to the Biodiversity Plan for Surrey (see 2.4 below).

2.4 The Biodiversity Plan for Surrey

The Biodiversity Plan for Surrey (BPS) incorporates changes brought about by the NPPF, identifies the importance of Ancient Woodland and veteran trees for biodiversity interest. Such habitats support woodland plants with limited dispersal abilities, mammals such as bats and dormice which are protected species, as well as woodland birds and butterflies (many of which are in decline nationally), invertebrates and often lichen, mosses and fungi.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPS16/2190 | Respondent: | 15371361 / Friends of Normandy Wildlife (Alistair Lawson) | Agent: |
|-------------|--------------|-------------|--------------------------------------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Policy A46 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3.1 Policy A46: GBC have failed to take into consideration the impacts upon wildlife and habitats both within the proposed development site and in SSSI's and SNCI's in the surrounding area in breach of Section 11 of the NPPF (see 2.1 above)

3.1.1 Impact on the wider environment of the Thames Basin Heaths Special Protection Area

We believe that the Plan is unsound in relation to Policy A46 as the Habitats Regulations Assessment prepared for GBC does not take sufficient account of the impact that this huge proposed development specifically will have upon the Thames Basin Heaths Special Protection Area (TBH SPA) which is a European Site as defined under the Habitats Directive and Conservation of Habitats and Species Regulations 2010 (as amended). The proposed development is considerably less than five kilometres away from the TBH SPA and not much beyond the 400m exclusion zone, occupying an area between under km, to just over 2km, from the TBH SPA. It has been indicated
that the cumulative effect of further residential development up to 5 km from protected heathlands will have a significant adverse effect on the heaths. Furthermore, Natural England believes that recreational use of the heaths arising from housing developments up to five kilometres away from a SPA will create disturbance to rare bird populations. The TBH SPA is an internationally important habitat for three rare species of bird - the Dartford warbler, woodlark and nightjar. The latter two are ground nesting and therefore particularly susceptible to disturbance from people and animals.

We therefore question whether enough - or indeed any - consideration been given to the potentially detrimental effect that the proposed strategic development between Normandy and Flexford will have on this internationally important site.

A survey in 2008 showed that more than 83% of visitors to the SPA arrived by car and that 70% of those had come from within 5km of its access point. A very large proportion of the TBH SPA visitors are dog walkers, many of whom visit a particular site on a regular basis. Two hundred and sixty four dogs are likely to come with the proposed development, the current ratio of dogs per household being 24/100, so this could potentially attract between 26 and 132 extra dog-walkers a day.

To deter dog-walkers from visiting the TBH SPA, any Suitable Alternative Green Space (SANG) in the proposed development would have to be of exceptional quality, as the Nightingale Road and Dolley's Hill entrances to the TBH SPA are only either 5 minutes away by car, or 20 minutes on foot. Whatever the size, the SANG would be a very small area in which to exercise 264 dogs. A small number of irresponsible dog owners, who do not scoop the poop, will make such a small area unattractive for walk and play. This is already a problem on Normandy Common.

Another factor is that some areas where a SANG might be located are muddy in wet weather and throughout the winter, whereas many of the tracks on the TBH SPA are dry in wet weather, (including the winter). For those dissatisfied with the proposed SANG for whatever reason, or those wanting a longer walk, the natural alternative is the TBH SPA. If only 10% of dog owners use the TBH SPA, there would be 26 extra dogs a day using the TBH SPA; if 50% do, it would be an extra 132 dogs a day.

Friends of Normandy Wildlife believe, that given the proximity of the proposed development to two entrances to the TBH SPA it will be impossible to design a SANG that will deter many residents from using the TBH SPA to walk their dogs. This will have a very serious impact on the wildlife and overall environment (unique flora and fauna) of this internationally important area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID:</th>
<th>PSLPS16/2191</th>
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<th>15371361 / Friends of Normandy Wildlife (Alistair Lawson)</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A46</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3.1.2 Impact of increased volumes of traffic on wildlife

If the proposed development goes ahead, there will be an increase in pollution with respect to air quality, noise and light levels, particularly where cars have to queue at junctions or obstructions. The transport strategy proposed by GBC for this strategic site contains no scheduled improvements for Glaziers Lane and very few for Westwood Lane, both rural lanes. The A323 to the North of the site will also be affected, and very few improvements to that road are planned.
This will affect not only the people living in the area but also local wildlife. Natural England addressed this issue in: 'The ecological effects of air pollution from road transport' (2016) which states that: "Biodiversity 2020 identifies air pollution as a direct threat to biodiversity in England. Many habitats of nature conservation importance in the UK are nutrient-conditions and/or are vulnerable to acidification, and are sensitive to additional airborne nitrogen oxides (NOx), sulphur dioxide (SO2) and ammonia (NH3), as well as to nitrogen deposition and acid deposition." In addition, noise from traffic can result in hearing loss in animals. It masks important environmental clues and animal signals. It can result in stress and induce behavioural effects, such as abandonment of territory. With regard to light, predators use light to hunt, and prey species use darkness as cover. Thus increased light at night alters the predator/prey balance and can also affect breeding behaviour in many species.

The environment and the wildlife in and around the four designated SNCIs on the A323 in Normandy i.e. Wyke Churchyard SNCI, Normandy Common SNCI, Wanborough and Normandy Woods SNCI (northernmost wood) and Wyke School Woods SNCI, all of which border the road, will be adversely affected by increased traffic and associated pollution. The UK BAP Traditional Orchard Habitat in Glaziers Lane will also be affected.

Another road where traffic will also be significantly increased is the A324. This borders the TBH SPA and increased traffic and pollution will therefore have an adverse effect on the heathland.

The increase in volume of traffic resulting from the proposed A46 development will reduce Biodiversity and harm wildlife. The transport strategy for the area does nothing to mitigate for this and does little to reduce the number of additional motorised vehicles on the roads around the site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Comment ID: PSLPS16/2193  
Respondent: 15371361 / Friends of Normandy Wildlife (Alistair Lawson)  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A47

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3.2 Impact of Policy A47.

The majority of the site covered by this part of the development is designated as an SNCI and lies within an area identified as a 'Water Vole Alert Area' as identified by the National Water Vole Database and Mapping Project in 2012.

It is shocking that GBC would ever consider an SNCI a suitable site for development, particularly given the statements in the NPPF (Para 109) and the Council's own Policy 14 as set out in section 2.1 and 2.2 above. We find it a telling insight into the very low value that GBC places on Biodiversity and wildlife.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Comment ID: PSLPP16/4696  
Respondent: 15371361 / Friends of Normandy Wildlife (Alistair Lawson)  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3.1.3 Impact of the proposed density of housing and Policy D4.
A large development such as proposed for site A46, with urban housing density, will impact significantly on wildlife within the ancient woodland and veteran trees on the site. The damage to both the environment and its wildlife would be immeasurable regardless of whether buffer zones are put in place.

Not only would the woodland wildlife on the site be harmed, but also wildlife in the woodland next to the site, i.e. the North end of Walden's Copse and Pussey's Copse. Furthermore, it is very important not to break the canopy in any of the existing connections between these woodlands for fear of wildlife isolation. Dormice, for example, do not often like to come down to the ground preferring to move through the canopy.

With the proposed development will come cars, noise, light and air pollution all of which are hazardous to wildlife. As well as increased human activity, there are likely to be approximately 187 extra cats in the area, cat ownership currently being 17 out of 100 households, together with a large number of dogs (see section 3.1.1. above). These animals would undoubtedly have a serious impact on the wildlife of the woodland areas no matter how well the woodland are protected by fencing for example (it is well known that people cut fencing to facilitate access).

The elimination of farmland on site A46, which has traditionally been used for grazing, would also be disastrous since it provides habitat for a variety of wildlife including hedgehogs (which are seriously in decline), bats, owls, and woodpeckers. The open fields are important hunting grounds for barn owls, which can only hunt over open space, and birds of prey such as red kite, buzzard and kestrel. Bats have been seen to hunt by the avenue of ancient oaks and on the wooded edges.

At present, the majority of houses in the villages of Normandy and Flexford have fairly large gardens, which support large numbers of wildlife species. The increased density in housing will come with gardens of much reduced size. There is also a trend in such housing developments for areas to be paved over for parking. Taken together, this results in a further reduction in the amount of green space, and the value of the gardens for wildlife declines.

GBC are of the opinion that the size of garden is irrelevant when it comes to maintaining biodiversity (see answer given by GBC to question 26 at the meeting organised by Normandy Parish Council on 24 February 2016). This is incorrect.

According to an internet article compiled by Ken Thompson and Steve Head, entitled 'Gardens as a resource for wildlife' (Wildlife Gardening Forum) It has been shown that total vegetation is a major determinant of diversity and abundance of wildlife. In this article the potential national significance of gardens as a resource for wildlife is clear, but that as garden size decreases, the area occupied by trees, hedges and tall shrubs also declines, with a resulting decline in biodiversity.

Policy D4 anticipates that new possible development sites will be proposed in inset villages (which will include Normandy and Flexford if the Plan is adopted) in addition to current site locations. Whilst they state that they aim to protect the important character of these inset villages using other development management policies, it is inevitable that any such development, if granted, will further increase housing density, with greater impacts on wildlife (as above).

GBC state in the Plan that they have a responsibility to use natural resources, such as land, wisely. They are of the view that increasing densities of housing is one such wise use of land, because it makes development more sustainable. However they fail to take account of the impact of such development on wildlife and the environment, both within the proposed development site and on statutory and non-statutory designated sites in and around Normandy and Flexford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The Friends of Normandy Wildlife (FNW) strongly object to eight points in the Guildford Borough Council (GBC) Proposed Submission Local Plan: Strategy and Sites, June 2016 (the Plan). These are:

- The late inclusion of A46 in the Plan
- Errors in the Evidence Base regarding Settlement Hierarchy and Settlement Profile of Normandy and Flexford
- Non-compliance by GBC with Policy 14
- The proposed development in Normandy and Flexford (Site A46)
- The proposed development in Flexford (Site A47)
- The Transport Strategy in relation to Normandy and Flexford
- The urban density of housing proposed for A46 and Policy 04
- The insetting of Normandy and Flexford (Policy P2)

FNW object because we believe the Plan to be unsound and unsustainable and does not therefore meet the requirements set out in the National Planning Policy Framework. The proposed development represents a serious encroachment on the Green Belt and would have a significant and deleterious impact on biodiversity and the natural environment including wildlife. These are factors which are highlighted as important in National, County and Borough Council policies relating to planning, yet they have been completely ignored within the Local Plan.

In view of the fact that the proposed development (A46) was put into the Plan after the Regulation 18 consultations in 2013/14 and not published until April 2016 in the Draft Local Plan, residents of Normandy Parish have not had a previous occasion on which to comment upon it. FNW have attempted to address this omission in this response, in so far as the proposed development impacts upon wildlife and wildlife habitats (flora and fauna), both on the Thames Basin Heaths Special Protection Area, and on the countryside which will be enveloped by this development. This may mean that our response combines a Regulation 18 and a Regulation 19 submission.

In our submission, we demonstrate the major significance of Normandy and Flexford for biodiversity, wildlife and nature conservation with its nationally important sites for nature conservation within and adjoining the parish. We highlight the serious detrimental effects the development will have on these areas, and illustrate how the planning proposals (with particular reference to Policies A46, A47 and the Transport Strategy) directly conflict with National planning policies and Guildford Borough Council's own interpretation of these.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object specifically to proposed building on Gosden Hill Farm on the Green Belt designated to prevent West Clandon being absorbed into a sprawling urban environment four times the size of the village it blights;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/4677</th>
<th>Respondent: 15371489 / Vivian E. Thomas CBE</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that infrastructure has not been properly assessed and is inadequate to deal with current housing levels-roads, doctors, schools will not be able to cope;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/4674</th>
<th>Respondent: 15371489 / Vivian E. Thomas CBE</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to building on the Green Belt. The essential characteristic of Green Belt is its openness and permanence :moreover this Government featured in its manifesto full protection of Green Belt as a core undertaking.

I object to the changes to Green Belt boundaries. This is not justified by any very special circumstances. All Green belt sites meet the five purposes of the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/4679</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object that housing on the Green Belt will significantly increase traffic already at saturation point) bringing increased danger, pollution and slower journey times.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4673  Respondent: 15371489 / Vivian E. Thomas CBE  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Over 20,000 responses objected to the 2014 draft Plan. Given that this new plan does not materially deviate from the earlier example I object that this Plan does not address my core concerns in any way. It can be best described as moving the deckchairs around on the SS Titanic and to no positive effect.

Specifically I bring the following points to your attention.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4675  Respondent: 15371489 / Vivian E. Thomas CBE  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the scale of new building throughout the borough which is both disproportionate and unjustified;
- I consider the calculation of housing need is unsubstantiated. The model has not been scrutinised and some fundamental assumptions are flawed. The housing target is unconstrained;
• I object to the fact that brownfield land would be disproportionately used for commercial development and unnecessary retail expansion which means that

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4676  Respondent: 15371489 / Vivian E. Thomas CBE  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to all other sights in the Local Plan, Blackwell Farm, 3 Farms Meadows, Garlick's Arch, West Horsley and Hog's Back. All are out of proportion to the surrounding area and none qualify to take them out of the Green Belt;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4678  Respondent: 15371489 / Vivian E. Thomas CBE  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that new sites have been proposed in this consultation which have not been previously considered, which is not appropriate at this stage;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4680  Respondent: 15371489 / Vivian E. Thomas CBE  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D).

The housing numbers proposed are for nearly 14,000 homes over 15 years from 2016 to 2031. This number is too high. The model used to calculate the number has not been seen or the assumptions tested by the council or any of its officers. It has been, on numerous occasions shown to be flawed by various 3rd parties. This housing target will result in the borough's permanent resident population increasing at 4.5 times the rate of population increase during the period 2001 to 2011. This population growth, by definition, is excessive and unsustainable for a gap town with many environmental, physical and infrastructure constraints.

Over 70% of the proposed housing is planned for land currently in the Green Belt. Housing need is not a reason in law for protected green belt land being used. It is perverse for so much housing to be planned for the green belt. Clearly, the green belt has not been used as a constraint as clearly set out in Government advice, planning policy guidance, the NPPF, case law, election manifestos and Ministerial letters to MPs.

For the West Horsley this is reflected in a 35% increase in the number of houses within 3-5 years of a plan being adopted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

7. I object to the expansion of commercial land in the urban area losing the potential for further housing. Policy E7: Guildford Town Centre

There is no reliable evidence provided that the retail core of the Town Centre can support expansion of 45,000 sq m of additional retail space at North Street.

Online retail is set to account for 21.5% of total retailsales by 2018 from 12.7% in 2013, the highest online retail share in the world according to the Centre for Retail Research. March 2016, online sales rose 12.3%, and it was the third consecutive month in which more than 20% of all non-food shopping took place online. (British Retail Consortium and accounting firm KPMG) With such a high retailers will need just 70 high street stores to create a national presence compared to 250 in the mid 2000's. An expansion on such a scale is negligent when the Council claims to be in such desperate need for housing.

Retail is a declining industry and should not be invested in by the Borough at the expense of housing in the most sustainable urban location, near employment and transport hubs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4691  Respondent: 15371777 / Peter Thackery  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages. There is too much traffic in our villages already and this plan will cause more congestion in West Horsley, East Horsley, Normandy, Ockham, Ripley, Send and Clandon, with no plan to improve that. The rural roads in this area are narrow, in poor condition and have no footpaths. 5000 more houses in such a small area means dangerous and unsustainable traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4693  Respondent: 15371777 / Peter Thackery  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

6. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

The A3 or M25 would have to be improved before any development is done. Highways England has no plans to even start considering improving the A3 before 2020. Under the current economic climate post Brexit, it is unlikely any additional funding will be made available for new capital projects. Clearly no real improvements are possible in the timeframe of this Plan so the developments at Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25), should not take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4692  Respondent: 15371777 / Peter Thackery  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

5. I object to poor air quality concerns (Policy I3)

The huge developments being proposed, particularly in the north east of the borough will lead to considerable further congestion and to greater levels of air pollution, which will have a detrimental effect on local residents and their health. It has been shown that Wisley already has NOX levels above the EU legal limits and by law a school cannot be located in this area as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4690  Respondent: 15371777 / Peter Thackery  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to not protecting the Green Belt (Policy P2)

Our Green Belt is precious. It is what protects London from urban sprawl; it preserves air quality; it prevents flooding; it is the city's playground. It is for us to conserve and protect it. There are 5 legal purposes for Green Belt, and it meets them all:

- To check the unrestricted sprawl of large built up areas
- To prevent neighbouring towns merging into one another
- To assist in safeguarding the countryside from encroachment
- To preserve the setting and special character of historic towns
- To assist in urban regeneration by encouraging the recycling of derelict and other urban

This policy is flawed and should have been amended. In the last consultation just six individuals, out of the c. 7,000 of those who took part in the consultation, supported the policy. Another 20 comments of support were from organisations such as: the University of Surrey, local councils (including Guildford), consultants (e.g. Savills) or landowners. But of the 1,371 who commented on the green belt policy 1,332 (97%) were against.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4697  Respondent: 15371777 / Peter Thackery  Agent: 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

7. NO EXCEPTIONAL CIRCUMSTANCES

The local plan proposes nearly 9000 new homes to be built on Green Belt land (compared with 50 000 current homes in Guildford, so approx. equato 18% of the existing homes in the borough) - a huge proportion. The National Planning Policy Framework (NPPF) requires any change of Green Belt boundaries to demonstrate exceptional circumstances. Unmet housing need is NOT an exceptional circumstance in law. No exceptional circumstances have been disclosed. So the Green Belt boundaries should NOT be changed through the plan making process.

8. BROWNFIELD AVAILABLE

There is brownfield land available in the town centre which is being earmarked for commercial development rather than for housing. This is enough to meet our real needs for affordable local homes. There are enough vacant commercial sites to cope with genuine business need, and we have enough retail capacity already, so urban brownfield/derelict land should be used for housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
### 10. DRAINS, WATER SUPPLY, FLOOD RISK, CONGESTION

Our drains, our water supply, our medical facilities and our roads cannot cope with the proposed number of new homes. Building this number of homes will lead to flood risk here and downstream (along the Wey and Thames). The planned development on Green Belt is therefore unsustainable.

In conclusion, I must ask you to revise the housing number, and to amend the Local Plan to utilise brownfield land rather than green field sites.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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### 1. I object to the Local Plan as the development proposed is not sustainable (Policy S1)

13,860 new houses proposed is not sustainable - it will damage local communities by over development, especially West Horsley, East Horsley, Normandy, Ockham, Ripley, Send and Clandon. The local communities don't need these houses. Wisley Airfield (A35) and Garlick's Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car.

The development should be in urban areas where there is sustainable transport. West Horsley for example will see the number of housing increased by 35% within 3-5 years of the plan being adopted. The number and density of housing is not in keeping with the local area and is therefore against policies within the NPPF.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3370  Respondent: 15371809 / Susan Pengilly  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions I-7 of the questionnaire): ()

I object to Ripley and Send villages being removed from Green Belt. The Government initiative of Green Belt was intended to be permanent, re National Planning Policy Framework, and there are no special circumstances to justify a change. In particular Send's Green Belt provides an essential buffer to stop Woking and Guildford becoming one conurbation.

Local Councillors and central Government gave a clear election promise to protect the Green Belt and this reneges on it. Developers will be quick to take advantage and there will be nothing to stop them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6557  Respondent: 15371809 / Susan Pengilly  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions I-7 of the questionnaire): ()

I object to building 45 houses at Clockbarn Nursery - inadequate access and traffic volume. Tannery Lane is far too narrow and twisty to take any more traffic and Send Road junction already hazardous for vehicles trying to join main road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2192  Respondent: 15371809 / Susan Pengilly  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
I object to site A43 Garlicks Arch - site of ancient woodland dating to 16th century important wildlife area
I object to site A43a - on and off ramp at Clandon - local roads are already choked with "cut through" traffic. The local roads and infra-structure cannot cope with more traffic, and a junction here would also encourage heavy good vehicles.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I Object to the building of 400 houses and 7000 sq metre of industrial space at Garlicks Arch opposite Send Marsh Road. This site floods and is covered by ancient woodlands. The industrial space here is not needed, and would be better sited at Slyfield. Woodland should be protected and conserved - once gone it cannot be reclaimed - there are better brown field sites that could used.

There is heavy traffic already on local roads as rushhour traffic tries to find "cut throughs". Our Roads cannot cope with such an increase in population, this will result in infrastructure overload

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Hence a further **major objection** to a new interchange with the A3 at Burnt Common.

This would take traffic from the proposed 2000 new houses at Wisley Airfield, 2000 at Gosden Hill Burpham and 1850 at Blackwell Farm. Much of this traffic to and from the A3, M25, Woking and Guildford would go through Send. Send Road, which is already overloaded, would become gridlocked. Noise and pollution levels, already at excessive levels, would worsen.

I would appreciate if the Planning Inspectorate can be made fully aware of my objections and would request confirmation that you have received this communication.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/6556  **Respondent:** 15371809 / Susan Pengilly  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the plan to build 40 houses and 2 travellers' pitches at Send Hill. This is inappropriate with a narrow width single access country road. Subsoil of proposed site also contains documented unsafe landfill waste registered at GBC.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/4698  **Respondent:** 15371809 / Susan Pengilly  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Once gone these areas cannot be reclaimed and this this area of small local village communities becoming Guildford urban sprawl.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/4695  **Respondent:** 15371809 / Susan Pengilly  **Agent:**
As a resident in Ripley/Send Area I am aghast at the proposed local plan:

I object to removal or “insetting” of Ripley, Send and Clandon areas from the green belt - this is total turnaround on gov policies to honour and protect greenbelt areas.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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With Slyfield Industrial site and large shopping outlet sites on Ladymead Estate is there real proof that further development just a few miles away is needed!

I suggest further consideration of brown field sites or of the Wisley Aerodrome area - this is a large area of underused land that could be better utilised.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
15. I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick's Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1198  Respondent: 15372417 / P. Mew  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

16. I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan's proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2197  Respondent: 15372417 / P. Mew  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
13. **I object to the inclusion of the land at Garlick's Arch, Send Marsh/Burnt Common and Ripley (A43)**

Garlick's Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (82) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brownfield site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick's Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy 13).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy 03).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy 14)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy 11)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/2198  **Respondent:** 15372417 / P. Mew  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**
1. I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of 'through' traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through Glandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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8. I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I object to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick's Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
5. I object to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4710  Respondent: 15372417 / P. Mew  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

6. I object to the location for new employment floorspace at Garlick’s Arch - Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4711  Respondent: 15372417 / P. Mew  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
7. I object to the loss of rural employment (Policy ES)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick's Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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9. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Glandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

With some 5000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
10. I object to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick's Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick's Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4715  Respondent: 15372417 / P. Mew  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

11. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy 12)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that "Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health." The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

3. I object to not protecting the Green Belt (Policy P2)

I object to the proposals to remove the villages of Ripley, Send and Glandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick's Arch (A43).

National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.
Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4706  Respondent: 15372417 / P. Mew  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4. I object to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough's identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick's Arch (A43) is identified on the Environment Agency's flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council's SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commisioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4703  Respondent: 15372417 / P. Mew  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on the local communities by overdevelopment, particularly for the villages between Guildford and the M25, including Ripley, Send and Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35) and Garlick's Arch (A43) are in unsustainable locations. They do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4704  Respondent: 15372417 / P. Mew  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2. I object to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill (Glandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Glandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.
We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I wish to register OBJECTIONS to the Proposed Submission Local Plan in respect of its impact on East and West Horsley.

GREEN BELT

No sound case has been made for justifying changes to Green Belt Boundaries laid down by national legislation.

The National Planning Policy Framework requires any change in Green Belt boundaries to be the result of exceptional circumstances. No exceptional circumstances have been demonstrated.

PROPOSED HOUSING DEVELOPMENTS

The proposed development of 533 homes on Green Belt sites, at much higher densities than currently exist, would be totally out of character with the existing houses and village layout. These developments would also be unsustainable in terms of drainage, roads capacity, schools, medical facilities, shops, parking and public transport.

LAND AT FORMER WISLEY AIRFIELD

The proposal to build approximately 2000 homes at this site is in effect the creation of a New Town in the Surrey Green Belt. This development would be a severe contravention of Metropolitan Green Belt policy and would have a major adverse impact across a widespread area, including East Horsley.

CONCLUSION

I object to the Proposed Submission Local Plan. The Council should be directed to amend the Local Plan by using brownfield and previously used land for housing instead of encroaching on Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I was born and raised in Send and had just put in an offer on a house in Send and was looking forward to returning to the Borough. I have withdrawn my offer as I would not like to live in an area or Borough that does not try to protect its greenbelt or open spaces. I therefore object for the following reasons.

I object to the removal of Send from the Green Belt because the village and its countryside provides a necessary buffer between Woking and Guildford.

I object to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

• I object to the proposed new interchange onto the A3 at Burnt Common because it would be disastrous for Send and the (A247) would be gridlocked all day.

• I object to the proposed new interchange onto the A3 at Burnt Common because the Transport Evidence is incomplete and unreliable and shows there will be congestion because Send would be used as a cut through to the A3/ M25.

• I object to the fact that infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing Roads, doctors and schools will be unable to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the building on the Green Belt at Send at Garlick's Arch, Clockbarn Nurseries and Send Hill because it is not justified by any special circumstances and the fact that Green Belt is meant to be permanent and not continually eroded.
- I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford's urban brownfield areas much closer to existing transport hubs.
- I object to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.
- I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.
- I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4758  Respondent: 15373089 / Gavin Biard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The NPPF states that the presumption in favour of sustainable development "should be seen as a golden thread running through both plan-making and decision-taking." Standing at the head of the draft plan, Policy S1 ought to set a dear framework. Instead, no definition of "sustainable development" is given.

The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

Thank you for reading this and I hope my views are I look I object to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially forward to your reply.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to site A35 Wisley Airfield. The proposed development is totally inappropriate and a more suitable use for the site would be as a park-and-ride 'hub' with buses going to Guildford, Woking (via Send), Heathrow and Gatwick Airports and possibly other places such as Effingham Junction as well. Tilis would reduce traffic flows on the M25, A3 and other local roads.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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I object to the 2016 draft local plan for the following reasons:

I object to the local plan as the development proposed is not sustainable. The number of houses to be built per year is too high, firstly this should be constrained by infrastructure, for example a number of schools are at capacity already, secondly the overall requirement should be reviewed in the light of the recent referendum decision for the UK to leave the EU.

In particular I object to the late inclusion of sit A43 Garlicks Arch. This is a green field site with productive agricultural land and ancient woodland. For the development which is proposed the previous A43 site at Burnt Common was much more suitable, with land which is currently unused.

I support in principle the idea of a new junction with access to and from the A3 in both directions somewhere between Burpham and Burnt Common, however the correct place for this is near to site A25 Gosden Hill Farm, using both sides of the Portsmouth Road dual carriageway to access the new junction from Bumi Common roundabout.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ) is Sound? ( ) is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A58 at Burnt Common which is now a new allocation for a minimum of 7,000 sqm of industrial or warehousing. Surely this is a mistake and the word should be 'maximum', as in the 2016 plan. Since that time there has been a decline in demand for industrial land. Slyfield and Guildford have empty units and site A45 is totally unsuitable for a large industrial estate. I continue to support in principle the idea of a new junction with access to and from the A3 in both directions somewhere between Burpham and Burnt Common, however the correct place for this is near to site A25 Gosden Hill Farm, using both sides of the London Road dual carriageway to access the new junction from Burnt Common roundabout.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/783  Respondent: 15373153 / C R Woodland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ) is Sound? ( ) is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the local plan as much of the development proposed is on the Green Belt without being constrained by infrastructure, for example roads and a number of schools are at capacity already.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1213  Respondent: 15373281 / Elizabeth Stefania  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ) is Sound? ( ) is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I cannot understand why you wish to destroy local village life. I am 86 and have lived in Send all my life. It has undergone many changes, but this latest proposal is heartbreaking. Where are the schools or Doctors to help with an already over full village?

I object to the removal of Send from the Green Belt because the village and its countryside provides a necessary buffer between Woking and Guildford. I also object strongly to the following.

I object to all the Proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2207  Respondent: 15373281 / Elizabeth Stefania  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• I object to the proposed new interchange onto the A3 at Burnt Common because it would be disastrous for Send and the (A247) would be gridlocked all day.

• I object to the proposed new interchange onto the A3 at Burnt Common because the Transport Evidence is incomplete and unreliable and shows there will be congestion because Send would be used as a cut through to the A3/ M25.

• I object to the fact that infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing Roads, doctors and schools will be unable to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4775  Respondent: 15373281 / Elizabeth Stefania  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
• I object to the building on the Green Belt at Send at Garlick's Arch, Clockbarn Nurseries and Send Hill because it is not justified by any special circumstances and the fact that Green Belt is meant to be permanent and not continually
• I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford's urban brownfield areas much closer to existing transport hubs.
• I object to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.
• I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are already at 100% capacity.
• I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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The NPPF states that the presumption in favour of sustainable development "should be seen as a golden thread running through both plan-making and decision-taking."1 Standing at the head of the draft plan, Policy S1 ought to set a dear framework. Instead, no definition of "sustainable development" is given.

The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

Thank you for reading this and I hope my views are I look I object to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially forward to your reply.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPA16/1208</th>
<th>Respondent: 15373313 / Hugo Holden</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to rai sing the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2204  Respondent: 15373313 / Hugo Holden  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to new sites (Garlicks Arch) being introduced as an after thought when it was not even considered in the previous plan. A slip road on the A3 at Burnt Cornnlon has been added to the Draft Local Plan without Highways England consent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4767  Respondent: 15373313 / Hugo Holden  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to a totally unrealistic number of houses for the country lanes to absorb.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4769  Respondent: 15373313 / Hugo Holden  Agent:
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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I object to the removal of villages from the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPA16/1210</th>
<th>Respondent: 15377473 / Deborah Holden</th>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners' views, or the costs involved in improving the infrastructure, currently out side their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formulated by a bottom up approach, not top down.

I object to the 2016 Draft Local Plan as it has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt. A35

I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.
I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

The assertion that the development will result in a meaningful shift to cycling

The increased volume of car traffic. A proposed development of 2,068 homes

The congestion this traffic will cause on the narrow rural roads in Ockham and

The danger this traffic will be to local cyclists and pedestrians, due to the

The increase in the already severe congestion on the Strategic Road Network

The lack of suitable public transport. The local rail stations of Effingham and

walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars would result in an estimated 4,000 additional cars on the roads on the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements

The absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)

The A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest. Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/2210  Respondent: 15377473 / Deborah Holden  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to new sites (Garlicks Arch) being introduced as an after thought when it was not even considered in the previous plan. A slip road on the A3 at Burnt Common has been added to the Draft Local Plan without Highways England consent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4787  Respondent: 15377473 / Deborah Holden  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to a totally unrealistic number of houses for the country lanes to absorb.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4793  Respondent: 15377473 / Deborah Holden  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT TO NO CASE FOR DISABILITY CARE OR AFFORDABLE HOMES

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4808  Respondent: 15377793 / Robin Dabbs  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO NO CONFIRMATION FOR ALLEGED HOUSING NEED NOS. I OBJECT TO LACK OF IMMEDIATE PROVISION FOR NEW SCHOOLS

I OBJECT TO NO IMMEDIATE PROVISION FOR DOCTORS SURGERIES

I OBJECT TO THE LACK OF ALL INFRASTRUCTURE BEFORE HOUSING & INDUSTRIAL DEVELOPMENT

I OBJECT TO THE ADDED IMPACT ON EXISTING ROADS LINKING: SEND-OLD WOKING, BURNT COMMON-RIPLEY, RIPLEY-E.CLANDON, A3-M25

I OBJECT TO PRIORITISING GREEN BELT DEVELOPMENT OVER BROWNFIELD WHICH COULD SUPPORT 50% BUILDING

I OBJECT TO INCORRECT HANDLING OF DEVELOPMENT THROUGH REGULATION 19 INSTEAD OF REGULATION 18

I OBJECT TO FURTHER INDUSTRIAL SPACE AT BURNT COMMON AFTER THE 80% REDUCTION IN EMPLOYMENT SPACE IN 2013

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4818  Respondent: 15377793 / Robin Dabbs  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT TO IMPROVED PUBLIC TRANSPORT FACILITIES & ACCESS NOT BEING PRIORITISED BEFORE BUILDING IS STARTED

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4820  Respondent: 15377793 / Robin Dabbs  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO IMPROVED PUBLIC TRANSPORT FACILITIES & ACCESS NOT BEING PRIORITISED BEFORE BUILDING IS STARTED

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4800  Respondent: 15377793 / Robin Dabbs  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO THE 2016 DRAFT LOCAL PLAN

I OBJECT TO ALL EROSION OF THE GREEN BELT

I OBJECT TO THE REMOVAL OF ANY VILLAGES FROM THE GREEN BELT

I OBJECT TO THE DISPROPORTIONATE DEVELOPMENT IN ONE AREA

I OBJECT TO THE LIMITED CONSULTATION PERIOD

I OBJECT TO INCLUSION OF NEW SITES WITH UNDER 2 WEEKS NOTICE

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/2224  Respondent: 15377825 / Christopher Dabbs  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO NEW DEVELOPMENT SITE AT GARLICKS ARCH NOT INCLUDED IN REG.18 DRAFT, PERMANENTLY PROTECTED AS GREEN BELT BY NPPF PUBLIC CONSERVATION OF ANCIENT C16 WOODLAND. WOULD SUGGEST IF 7000sqm INDUSTRIAL SPACE IS NEEDED BUILD IT ON THE BROWNFIELD SITE AT SLYFIELD

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT TO NO CONFIRMATION FOR ALLEGED HOUSING NEED NOS. I OBJECT TO LACK OF IMMEDIATE PROVISION FOR NEW SCHOOLS

I OBJECT TO NO IMMEDIATE PROVISION FOR DOCTORS SURGERIES

I OBJECT TO THE LACK OF ALL INFRASTRUCTURE BEFORE HOUSING & INDUSTRIAL DEVELOPMENT

I OBJECT TO THE ADDED IMPACT ON EXISTING ROADS LINKING: SEND -OLD WOKING, BURNT COMMON -RIPLEY, RIPLEY -E.CLANDON, A3-M25

I OBJECT TO PRIORITISING GREEN BELT DEVELOPMENT OVER BROWNFIELD WHICH COULD SUPPORT 50% BUILDING

I OBJECT TO INCORRECT HANDLING OF DEVELOPMENT THROUGH REGULATION 19 INSTEAD OF REGULATION 18

I OBJECT TO FURTHER INDUSTRIAL SPACE AT BURNT COMMON AFTER THE 80% REDUCTION IN EMPLOYMENT SPACE IN 2013

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4815  Respondent: 15377825 / Christopher Dabbs  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO IMPROVED PUBLIC TRANSPORT FACILITIES & ACCESS NOT BEING PRIORITISED BEFORE BUILDING IS STARTED

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4801  Respondent: 15377825 / Christopher Dabbs  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT TO THE 2016 DRAFT LOCAL PLAN
I OBJECT TO ALL EROSION OF THE GREEN BELT
I OBJECT TO THE REMOVAL OF ANY VILLAGES FROM THE GREEN BELT
I OBJECT TO THE DISPROPORTIONATE DEVELOPMENT IN ONE AREA
I OBJECT TO THE LIMITED CONSULTATION PERIOD
I OBJECT TO INCLUSION OF NEW SITES WITH UNDER 2 WEEKS NOTICE

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4831  Respondent: 15377953 / cctvtraining.com ltd (Gordon Tyerman)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY D1 Making better places

GROUND FOR OBJECTION We support the emphasis on views, natural features, local distinctiveness, and layout of surrounding buildings.

There is no reference to vernacular or historic design guidelines, even in Conservation Areas and we object to the absence of this from this policy. Most of the borough, especially the rural areas, have vernacular design guidelines which are available to give suggestions as to appropriate design. These should have mandatory planning force.

The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design – should it not result in better designed buildings?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4832  Respondent: 15377953 / cctvtraining.com ltd (Gordon Tyerman)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY D2 Sustainable design, construction and energy

GROUNDS FOR OBJECTION The emphasis on energy and waste hierarchies and reduction of carbon emissions as part of building design are welcomed. However, the emphasis on CCHP (Combined Cooling Heating and Power) and communal heating networks seems curious – no such networks are currently locally available. There is an element of “Greenwashing” – the imposition of aspirational environmental targets while ignoring the simple fact that building dormitory towns is environmentally unsustainable. These all require increased car use and will lead to increased congestion and so air pollution and higher carbon dioxide emissions and a few solar panels on roofs will not compensate for the considerable environmental cost.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4833  Respondent: 15377953 / cctvtraining.com ltd (Gordon Tyerman)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY D3 Historic environment

GROUNDS FOR OBJECTION conserving and enhancing the historic environment may be damaged by supporting ancillary development. In historic locations (Chilworth Gunpowder Mills, the NT sites like Clandon Park or Hatchlands, Guildford Castle, Guildford Museum etc) this policy needs to have an overriding emphasis on protection rather than supporting development. The emphasis on supporting some development – in the context of an authority that has already set in place aggressive reviews of Guildford Museum and the Electric Theatre – should be viewed with some caution. The reasoned justification seems reasonable but it must be noted that it is the wording of the policy, rather than the associated explanation, that must be key.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4834  Respondent: 15377953 / cctvtraining.com ltd (Gordon Tyerman)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY D4 Development in urban areas and inset villages

GROUND FOR OBJECTION There are effectively two separate parts to this policy, both are flawed, and in the case of insetting, fatally flawed. In the case of urban development there are numerous flaws, including:

- The plan envisages that 40% of homes built will be affordable, but this does not provide any accommodation for low paid workers, for example, those on the minimum wage, who cannot afford to buy “affordable” homes, nor can they pay the so-called “affordable” rent. There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low paid workers such as those employed in the retail, warehousing and distribution sectors.
- The number of homes planned in the urban area is too low – there is a need for regeneration in some areas, but this is ignored and instead the plan concentrates on building homes on green field sites, which does not meet the needs for housing within the town, especially with the centre. This is not a sustainable policy as building outside the town has a disproportionate effect on road traffic.
- The plan envisages a large expansion of the traditional “bricks and mortar” retail sector, but this is a sector in long term decline.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4817 Respondent: 15377953 / cctvtraining.com ltd (Gordon Tyerman) Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E1 Meeting employment needs

GROUND FOR OBJECTION

- the evidence base is unreliable
- there is unclear differentiation between B class uses
- only high added-value business uses are desirable, not low grade, low employment warehousing which is land hungry
- industrial and commercial businesses must be concentrated in the urban area, or existing business parks (e.g. Slyfield) not in the rural environment which the infrastructure is unable to support
- the rural environment must support micro or high tech businesses, agricultural industries, and tourism, and these sectors must not be damaged by general industrial development which is inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4819 Respondent: 15377953 / cctvtraining.com ltd (Gordon Tyerman) Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>POLICY E2 Location for new employment floorspace</th>
</tr>
</thead>
<tbody>
<tr>
<td>GROUNDS FOR OBJECTION We are of the opinion that all new office and research and development (use Class B1a and B1b) floor space should be within Guildford town centre. We do not support the policy of expanding the Research Park onto Blackwell Farm and we do not believe there are exceptional circumstances to justify incursion into this permanent and high quality area of Green Belt.</td>
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</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/4821</th>
<th>Respondent: 15377953 / cctvtraining.com ltd (Gordon Tyerman)</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>POLICY E3 Maintaining employment capacity and improving employment floorspace</th>
</tr>
</thead>
<tbody>
<tr>
<td>GROUNDS FOR OBJECTION We do not support the policy of resisting change of use from B1a to residential because it flies in the face of positive property market solutions for the regeneration of brownfield land and is contrary to current government policy which has recently been reaffirmed and permits a change of use from B1a (offices) to C3 (residential).</td>
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</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/4823</th>
<th>Respondent: 15377953 / cctvtraining.com ltd (Gordon Tyerman)</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY E4 Surrey Research Park

GROUNDS FOR OBJECTION We support the maintenance of research, development and design activities, in any science, including social science, that is complementary to the activities of the University of Surrey at the Surrey Research Park. We do not believe that there is a need to expand the Research Park into a larger Business Park. We believe that the planning policy going forward for the Surrey Research Park should be to maintain and enhance the integrity of its research base allowing for the economic value add to the local economy of knowledge and technology transfer from the University. We believe that B1b (should be the primary use class for the Research Park and that applications for B1a should be resisted due to the danger of dilution of the core purpose and reputation of the park. We do not believe the inclusion of B1c uses is appropriate or necessary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4825  Respondent: 15377953 / cctvtraining.com ltd (Gordon Tyerman)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E5 Rural economy

GROUNDS FOR OBJECTION Use of rural areas for town centre uses without applying the sequential approach is against the principles of localism which mean that local people should be consulted – and heeded (not ignored!). Villages need protecting both in terms of design and in terms of scale.

Previous commitments to improved high-speed broadband and mobile phone coverage have now been diluted, despite general support. This is disregarding the responses from the previous consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4827  Respondent: 15377953 / cctvtraining.com ltd (Gordon Tyerman)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY E6 The leisure and visitor experience

GROUNDS FOR OBJECTION Tourism and visitors do not depend on new visitor “attractions”. Overdevelopment of countryside is a risk.

Surrounded by the natural beauty of the Surrey Hills, Guildford is distinguished as an historic county town. The historic part of the town should be exploited to the full creating a real sense of vibrancy and atmosphere. This should be linked to the attractions of the Museum, the Castle, the Wey and the historic High Street including its views of the Hogs Back. Guildford would be wise to model itself on other historic towns like Bath, Chester and York. The economic impact would create big advantages for both the leisure and the niche speciality retail sectors in the town.

Guildford the historic “Gateway to the Surrey Hills” has far more potential than Guildford being a stereotypical centre found anywhere around London. The countryside can offer high quality tourism – including cycling, National Trust sites, open countryside and cultural events including theatre and opera – which is lucrative. This is not recognised fully.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4828  Respondent: 15377953 / cctvtraining.com ltd (Gordon Tyerman)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E7 Guildford Town Centre

GROUNDS FOR OBJECTION. There should be much more residential use of the town centre. There is limited need for further retail, which will disadvantage existing retailers as well as using valuable land inefficiently. Existing niche retailers should be supported, but this does not mean further retail expansion which could be counterproductive. There is an urgent need for a brownfield register and to focus on brownfield redevelopment before considering development outside the existing urban area. CIL strategy must promote brownfield redevelopment. Guildford should strive for high quality definition making it a great centre for people to live in and visit. It would be a great mistake if Guildford were to opt for large impersonal department stores and dull high street chain stores at the expense of exploiting its uniqueness and character which would afford greater benefits.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4829  Respondent: 15377953 / cctvtraining.com ltd (Gordon Tyerman)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
### POLICY E8 District centres

**GROUNDS FOR OBJECTION** We think it is appropriate that these three district centres should support development consistent with the scale and function of the local centre. We think it is appropriate not to approve planning applications for main town centre uses over 100 sq m outside district centres – although this policy could and should be more clearly articulated. We do NOT support consideration of sites on the edge of district centres for town centre uses.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID:</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

### POLICY E9 Local centres

**GROUNDS FOR OBJECTION** We do not think that retail development adjacent to the 6 rural centres is appropriate., nor sites on the edge of designated centres.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID:</th>
<th>PSLPP16/4805</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**
POLICY H1 – Homes for all

GROUND FOR OBJECTION. The housing mix is based on the assumptions set out in the Strategic Housing Market Assessment (SHMA) which has not been scrutinised or evaluated and so we must object overall. We support high density development in the urban area. Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up suitable family accommodation in the urban area. Guildford borough has already a higher proportion of traveller sites than most comparable boroughs and this should be taken into account when evaluating need for travellers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4807  Respondent: 15377953 / cctvtraining.com ltd (Gordon Tyerman)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H2 – Affordable homes

GROUND FOR OBJECTION. “Affordable” homes, under national definitions, means homes which are sold or rented at 80% of market value. Even at 70% rented this means that these homes will not be cheap, and starter homes will not be made available for local people. There is a viability clause (4.2.40) which means that in practice this could be unenforceable. We would be losing countryside for no local benefit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4809  Respondent: 15377953 / cctvtraining.com ltd (Gordon Tyerman)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H3 – Rural Exception Homes

GROUND FOR OBJECTION. This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (this includes agricultural land and the AONB). These homes could be homes for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve
the “mix” this can include “market” housing (ie normal commercial development). This policy means building anywhere, and ignoring all historic planning restrictions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID:</th>
<th>PSLPP16/4835</th>
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**POLICY I1 Infrastructure and delivery**

**GROUNDS FOR OBJECTION** Various aspects of Infrastructure are acknowledged as congested, inadequate for the existing population and not able to accommodate much growth. However, greenfield sites – requiring heavy infrastructure investment – are targeted in order to generate CIL income for the council. This is not sensible. The current draft CIL scale also encourages development on greenfield sites rather than brownfield.

The Council’s methodology assessing traffic and roads infrastructure needs is inadequate. It identifies only the tip of the iceberg in terms of existing congestion. Looking at local traffic situations around the Borough it becomes clear that the schemes proposed will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed locations would require highway schemes that involve demolition of property and road-widening in residential areas to solve the resultant congestion. The A3 improvements are not guaranteed to take place but they are being used to justify removing large areas from the Green Belt before detailed traffic assessments have taken place. These detailed investigations are being deferred until the planning application stage and will be left to developers to prepare. If a site then proves to be unsustainable its Green Belt protection will have been lost for no reason and unsuitable development will take place by a more insidious process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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</tbody>
</table>
POLICY I2 Supporting the Department of Transport’s “Road Investment Strategy”

GROUND FOR OBJECTION This policy is concerned only with the strategic road network – the A3 and M25 for which the responsibility and decision-making lies with Highways England. It is only reasonable that the council will work closely with Highways England to ensure that the Local Plan does not utilise land in a way that limit the scope for future improvements.

However, the proposals for the A3 are undecided and the council has suggested a very expensive tunnel proposal that, even if HE decided to go ahead with it, is unlikely to be delivered until the end of the plan period. Less expensive alternative A3 improvements would not be delivered before implementation of the current draft Local Plan and would deliver a massive growth in traffic. The road improvements are likely to lead to massive disruption to traffic during the construction phase on top of an already overloaded road network. It would be folly to make matters worse by committing to a massive housing number and the only logical conclusion is that a very significant traffic constraint should be applied to the OAN for this Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4837  Respondent: 15377953 / cctvtraining.com ltd (Gordon Tyerman)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY I3 Sustainable transport for new developments

GROUND FOR OBJECTION We support the concept of sustainable transport but object on the grounds that the practicalities have not been properly considered,

It is not sustainable to build dormitory towns and call them sustainable.

Not everyone can cycle all the time.

How can large developments outside the town centre maximise sustainable travel? This is a matter for the planning process- the further from the town centre, the less sustainable the development will be.

Reliance on cycling discriminates against vulnerable members of the community. How can the disabled, those with small children, or the very old, or the infirm, or those who are ill, cycle outside the town in order to commute, or even inside the town? Only some people cycle –and Guildford has some steep hills, especially going out of town. Park and rides are slow – how can those with a 3 hour commute add 1 hour to their journey from using park and rides?

The only sustainable mechanism for new developments is to have them in the town centre close to the railway and the main shopping links where a “hoppa bus” can provide satisfactory links for those who cannot walk or cycle.

While we welcome the intention to encourage rail travel by adding two new stations (subject to negotiation with Network Rail) there could unintended consequences.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY I4 Green and Blue infrastructure

GROUND FOR OBJECTION The Policy shows concern for conserving and enhancing biodiversity, which is welcome. We also note and welcome the intention to extend the principle beyond Biodiversity Opportunity Areas. However the current plan to build on large areas of countryside and to inset villages will have the opposite effect. The Policy appears therefore to be a box-ticking exercise with no real teeth to it.

There is no mention of the value of wildlife gardening to biodiversity or the important role that larger gardens play in a village setting.

There is no mention of the impact of the plan on food production, or monitoring the loss of agricultural land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

POLICY P1 – Surrey Hills Area of Outstanding Natural Beauty

GROUND FOR OBJECTION This policy is much weaker than previous protection. It is dependent on the Surrey Hills Management Plan. Note that this welcomes housing development. The Surrey Hills needs much more substantial protection. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4812  Respondent: 15377953 / cctvtraining.com ltd (Gordon Tyerman)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY P2 – Green Belt

GROUNDS FOR OBJECTION We object to the insetting of 14 villages from the Green Belt, and the proposal that infilling is acceptable within a further 12 villages within the Green Belt. We are concerned that “infilling” is also proposed outside the settlement boundaries of 11 further villages. Essentially, all the villages within the Green Belt are now vulnerable to extensive further development.

Green Belt is supposed to be protected as a matter of national and local policy, but this policy seeks to justify development in a supposedly protected area, in breach of local manifesto commitments and contrary to previous responses to public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4813  Respondent: 15377953 / cctvtraining.com ltd (Gordon Tyerman)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY P3 – Countryside (ie countryside beyond the Green Belt)

GROUNDS FOR OBJECTION. This seems more protective – as a policy – than the proposals for the AONB and the Green Belt which is anomalous. Note - we are not in favour of building on this area. We think that the brownfield areas within the urban area are sufficient to meet all reasonable housing targets. There should be no need to build on any green fields if brownfield (previously developed) land is used efficiently. (That does not mean garden-grabbing!).

However, we do not think this area justifies stronger policy protection than any other part of the borough. This policy refers to the area of countryside near Ash and Tongham (see paragraph 4.3.28). The fact that the current and previous
Council Leaders represent this area should not give it preferential status: “we will seek to limit any development in the countryside unless it can be demonstrated that it is necessary in that location”. Green Belt and AONB areas should – by definition - have higher levels of protection than non-Green Belt areas, which is not the case with this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4814  Respondent: 15377953 / cctvtraining.com ltd (Gordon Tyerman)  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY P4 : Flood risk and water source protection zones

GROUNDS FOR OBJECTION . There are aspects of this policy which are acceptable; it is sensible to protect groundwater source protection zones, provided that the maps are accurate.

However, urban development on hardstanding does not create increased flood risk, especially where there is the capacity for improved flood resistance measures to be included in the design. Sites such as the Arriva bus depot, on the River Wey bank, are potential high value brownfield land which may not be used for housing because of this policy. The footprint of existing buildings should not be the limit of future development, but the extent of existing hard standing. Tarmac and concrete do not act as functional floodplain, but some land with hard standing close to the river, within the town centre and within easy walking distance of the train station, provides an exciting opportunity for real urban regeneration which could protect the surrounding countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4816  Respondent: 15377953 / cctvtraining.com ltd (Gordon Tyerman)  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY P5: Thames Basin Heath Special Protection Areas

GROUNDS FOR OBJECTION. This policy is weak. The mitigation (cash compensation) offered for development in the special protection area is so small and negligible as to be meaningless.

SANG (Suitable Alternative Natural Greenspace) is not beneficial; the sites identified or targeted are already green space. To create SANG is just using agricultural or wooded land as recreation land in order to justify building on other green spaces. There is no actual increase in environmental protection; it is a policy designed to permit building on otherwise protected areas. SANG – in part used to prevent dogs and cats attacking nesting birds - must ensure that it is not using land which is adjacent to the special protection areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

POLICY S1 – Presumption in favour of sustainable development

GROUNDS FOR OBJECTION. While this wording is based on the National Planning Policy Framework (NPPF) – which is binding - this policy fails to recognise that development in rural areas, with inadequate transport and other infrastructure, cannot cope with the proposed scale of development. It is unsustainable. This should represent an absolute constraint on development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY S2 – Borough Wide Strategy

GROUNDS FOR OBJECTION. 13860 homes are proposed. This number has not been scrutinised by councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden. It is not reasonable to produce unsubstantiated numbers in order to justify major structural change in a widely protected area (89% Green Belt, 44% AONB, approx. 75% protected by SPA).

It is inappropriate to allocate this housing number, either over the plan period OR across projected sites, when the number itself is unsubstantiated. External consultants and members of the public have provided detailed criticisms of the model. If the housing number were substantially lower, and only met housing need, there would be no need to build on Green Belt or open countryside.

The number of homes proposed, plus existing planning permission, plus expected “windfall” sites, exceeds 13860. Guildford residents would not accept building homes on open countryside to meet Woking’s designated “need” but this seems to be implied.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/160  Respondent: 15377953 / cctvtraining.com ltd (Gordon Tyerman)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There are more Traveller sites in the plan than identified in the research carried out using the national traveller policies.

Paragraphs 86 of the plan has been ignored in Ash and Tongham which are being developed in such as way that there will be no demarcation between the two villages. Villages should be able to show green belt areas between them is protected. This huge development does not follow that government advice.

There are NO special circumstances that require Ash and Tongham to be developed in this way. (paras 89/90) There is NO protection for the small villages Ash and Tongham which does not meet the governments national strategy on housebuilding. (Non merger para 80)

Given there has been massive development in Ash and Tongham already, outside of this plan further massive development would create an imbalance of housing to local amenities. There are no school places for such a large growth in housing and subsequent student population. Ash and Tongham should be protected from further massive development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1217  Respondent: 15377985 / Moira Garten  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to protest strongly about the new proposal planning in the area. Apart from the strain on the schools, doctors and traffic. The roads around here are in such a state and overcrowded in the village where parking is at present so difficult.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. APPENDIX C

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

2. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

3. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1224  Respondent: 15379969 / Teresa Britton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. APPENDIX D

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.
The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2242  Respondent: 15379969 / Teresa Britton  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY A25 - Gosden Hill Farm

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents
2015

• 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays

Surrey Fire and Rescue deployed.

2016

• 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
• 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
• 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.
The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2243  Respondent: 15379969 / Teresa Britton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY A43 AND A43a – Garlick’s Arch

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase
when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)
The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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1. POLICY D3

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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1. POLICY D3

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4860  Respondent: 15379969 / Teresa Britton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY D4

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4849  Respondent: 15379969 / Teresa Britton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. **POLICY E1**

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/4850  **Respondent:** 15379969 / Teresa Britton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

1. **POLICY E2**

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.
There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4851  Respondent: 15379969 / Teresa Britton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E5

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4862  Respondent: 15379969 / Teresa Britton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E6

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For
example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPP16/4858  **Respondent:** 15379969 / Teresa Britton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **POLICY E7**

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable
residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4856  Respondent: 15379969 / Teresa Britton  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H1

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.
It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/4857  **Respondent:** 15379969 / Teresa Britton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **POLICY H2**

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford’s relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/4861  **Respondent:** 15379969 / Teresa Britton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **POLICY H3**

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1).

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists pass through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable
(and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 15379969 / Teresa Britton</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY I2

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).
Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/4855  **Respondent:** 15379969 / Teresa Britton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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1. **POLICY I3**

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/4847  **Respondent:** 15379969 / Teresa Britton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.
This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4863  Respondent: 15379969 / Teresa Britton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. SITES - POLICIES A1 TO A57

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that "allocating these sites does not grant planning permission for development." However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/4848  Respondent: 15379969 / Teresa Britton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY P4

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4845  Respondent: 15379969 / Teresa Britton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.
The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN were not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.
It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper account of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>SQLP16/844</th>
<th>Respondent:</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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</table>
1. Questions posed by Guildford Borough Council as part of its consultation.

24.A. Question 1: The evidence base and submission documents

The Proposed Submission Local Plan: strategy and sites is based on up-to-date evidence. The evidence base documents contributing to the preparation of the plan are listed in Appendix D and can be found on our website (links open in a new window).

Do you agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant?

ANSWER

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
24.B. Question 2: Legal Compliance

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant? Please provide the following information being as precise as possible:

- why you consider it is or is not legally compliant and
- what change(s) (if any) you consider necessary to make it legally compliant, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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24.C. Question 3: Soundness

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound? Please provide the following information being as precise as possible:

- why you consider it is or is not sound and
- what change(s) (if any) you consider necessary to make it sound, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. "Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt." Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.

3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford’s circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.

2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation.

2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation.

3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound.

4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018.

5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars.

6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham.

7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework.

8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.

9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.
11. In common with many others I do not believe the housing figure has been properly calculated and I believe it
overstates housing need. The Council has prevented councilors or others from properly considering the SHMA
by refusing to make public the basis on which it was drawn up.
12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's
circumstances, including in particular the Green Belt and road infrastructure. National policy permits such
constraints to be applied and it is inappropriate not to consider the need to do this.
13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on
a wholesale basis.
14. Cast iron commitment should be included in the plan that development can only commence when required
infrastructure improvements have been secured.
15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have
the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the
Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and
Greenfield sites and each of the above points addressed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** SQLP16/847  **Respondent:** 15379969 / Teresa Britton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

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**24.D. Question 4: Duty to cooperate**

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to
cooperate? Please provide the following information being as precise as possible:

- why you consider it has or has not complied with the Duty to cooperate and
- what change(s) (if any) you consider necessary to make it comply with the duty to cooperate, explaining why this
  is the case.

**ANSWER**

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to
cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes
and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to
inform and guide this 2016 draft Plan.
Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/843  Respondent: 15379969 / Teresa Britton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Re: Responses to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

I find it unbelievable that the Council is considering any of the proposed options to solve the Government’s housing targets! I have lived in Clandon for 28 years and have observed with horror the congestion and traffic problems increase year by year! Without any increase in building in the area I am unable to see how we can sustain a workable solution to the crisis we are facing on our local roads! With the addition of many new possible dwellings this crisis of infrastructure will be exacerbated beyond plausibility.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4742  Respondent: 15379969 / Teresa Britton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

C.i. Policy 25 Gosden Hill – My Objections

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.  
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints. 
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt, 
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity 
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford. 
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon. 
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below). 
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools. 
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km. 

What changes (2016)/further amendments (2017) do you suggest should be made to the document? 

Attached documents: 

Comment ID: pslp172/4744  Respondent: 15379969 / Teresa Britton  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Page 2327 of 2804
C.ii. Policy A43 Garlick’s Arch – My Objections

>> 1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches

>> 2. It ignores all the thousands of previous objections made by local people

>> 3. There is no proven demand for travelling show people plots in this location

>> 4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.

>> 5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.

>> 6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.

>> 7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

>> 8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

>> 9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

>> 10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

>> 11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

>> 12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

>> 13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.
14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general
industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

>> 26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4745  Respondent: 15379969 / Teresa Britton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

C.iii. Policy A58 Burnt Common – My Objections

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site

2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.

3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.

4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.“

5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.

6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.

7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning
permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp171/3195  **Respondent:** 15379969 / Teresa Britton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

**E. Policy S1 Presumption in favour of Sustainable Development– My Objections**

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
**Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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G. Duty to Cooperate – My Objections

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPA16/1230  **Respondent:** 15380129 / Penny Moore  **Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3. The infrastructure is already overloaded and would not be able to support the number of houses being proposed.

I would be pleased if you could take note of my objections.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPA16/1229  **Respondent:** 15380129 / Penny Moore  **Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
2. The inflated numbers of houses which have been arrived at through the “Strategic Housing Market Assessment”, the methodology for which is not revealed;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4883  Respondent: 15380129 / Penny Moore  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to express my objection to the proposals in the Guildford Local Plan for the Horsleys.

I have a number of concerns regarding the plan:-

1. The proposal to remove the Horsleys from the Green Belt without proving “exceptional circumstances”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4333  Respondent: 15380289 / Stephen Hewlett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I also object to the Borough Wide Strategy (Policy S2) GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans.

But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to any sites in West Horsley for any site with 5 or more houses. No planned infrastructure and will create an urban sprawl into neighbouring Ockham East and West Horsley.

I object to the allocation of manor Farm allocation A38
I object to the allocation of bell and colville allocation A37
I object to the allocation land at Ockham road north, West Horsley, allocation A40
I object to allocation of land at Ockham Rd north, allocation A39
I object to the allocation of Thatcher’s hotel East Horsley, allocation A36
I object to the allocation of land at East Lane West Horsley, allocation A41
I object to the insetting of town from the green belt
I object to the insetting of West Horsley
I object to the insetting of Ripley
I object to the insetting of West Clandon
I object to the insetting of Send

There is plenty of land for development in urban area that should be used rather than determinate further.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2016).

These are my main reasons are…

I object to the Local Plan as the following development proposed is not sustainable (Policy S1)

At least 148 more houses in East Horsley. At least 385 more houses in West Horsley.

I further object to both villages to be taken out of the Green Belt. The new boundary, (called the in-setting boundary) extends the old settlement boundary and includes some fields and open spaces. This means that Kingston Meadows (by East Horsley Village Hall) is included inside the insetting boundary – despite being a valuable green space. Horsley Tennis & Cricket club at the end of Pennymead Drive is also inside the insetting boundary.

This is totally unacceptable. I object to not protecting the Green Belt (Policy P2)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5876  Respondent: 15380289 / Stephen Hewlett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

My Self & My 97 yr old Father contact You to"OBJECT" in the strongest possible terms to the LOCAL PLAN in its entirety & also to"OBJECT"in the strongest possible terms to the inclusion of the "FORMER WISLEY AIRFIELD" as a strategic site in particular in the plan.It should be WITHDRAWN AT ONCE & WITHOUT QUESTION.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4921  Respondent: 15380289 / Stephen Hewlett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. No protection from local heritage sites

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4919  Respondent: 15380289 / Stephen Hewlett  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. No proper affordable housing (Where is the housing for poor people!!)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4913  Respondent: 15380289 / Stephen Hewlett  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Huge infrastructure problems drainage mains services supply etc. (Sewers in Ockham already having to be repaired to cope with more load and road traffic damage). Proposed sites in unsuitable locations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4916  Respondent: 15380289 / Stephen Hewlett  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
1. Dangerous narrow twisty lanes, especially for walkers and cyclists
2. Congested and gridlocked local main roads
3. Accidents and road works etc. cause gridlock

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1. Congested local roads
2. Limited safe parking for local people
3. Future years of heavy building companies etc would ruin local roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1. Local Doctors, Health centres, hospitals are full to capacity now!!
2. Local policing already overworked
3. Local schools etc already full to overflowing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/4904  Respondent: 15380289 / Stephen Hewlett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. No consideration of the harm that will be done to special protection areas, sites of special scientific interest’s and conservation area and Heritage asset’s

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4932  Respondent: 15380289 / Stephen Hewlett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal strategic SANG allocation at Long Reach west Horsley for close on 1,000 new houses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4926  Respondent: 15380289 / Stephen Hewlett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Proposed 70% new housing on green belt. [Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature.] What’s the point in having a Green Belt if you are just going to ignore it and build on it!!!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

| 1. Adverse effect on air quality in excess of EU permitted levels would be made worse by heavy increase in traffic levels |
| 2. Poor air quality would be bad for special protection areas. Not properly appreciated |

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I write to you to say that I support the objection made by “WAG” and in addition I also support the objections made by Ockham – Ripley – West Horsley – East Horsley parish councils; namely :-

| 1. The lack of a concise summary of what has changed on this revised Local Plan. |
| 2. 693 houses is far too high |
| 3. Disproportionate density population allocation |
| 4. Broken election manifesto, promise to protect the Green Belt. Councillors lied to the electorate |

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Historic local villages will be ruined by these large disproportionate developments
2. Proposed high density housing out of place in cities let alone these rural locations

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4915  Respondent: 15380289 / Stephen Hewlett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Proposed sites in unsuitable locations

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4918  Respondent: 15380289 / Stephen Hewlett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. No planning for local communities

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4924  Respondent: 15380289 / Stephen Hewlett  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Local environment would suffer through future developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLP16/4949  Respondent: 15380289 / Stephen Hewlett  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The profits to be made by these greedy offshore developers (Former Wisely Airfield) e.g. will go offshore. Have you not heard of tax avoidance evasion etc.

Tory and Lib Dem Guildford Borough Councillors were, are and will [Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  Capture2.JPG (151 KB)  Capture1.JPG (198 KB)

Comment ID: pslp172/2796  Respondent: 15380289 / Stephen Hewlett  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I continue to “OBJECT” in the strongest possible terms that policy A35 THREE FARM MEADOWS are still included in the DRAFT LOCAL PLAN. for many and various reasons and these include:-

1. It is an unsustainable site in whatever version it has been presented.
2. Unrealistic distance from existing railway stations. all other identified sites are closer.
3. The site is in touching distance of (J10) M.25. – A.3. the most gridlocked junction in Surrey and one of the most congested in the Country.
4. Local roads are full to overload now already!! and worsened by road works etc.
5. Small local roads and lanes unsuitable and unsafe for public transport with frequent delays.
6. narrow dangerous road to HORSLEY very hazardous to pedestrians cyclists etc.
7. nearby R.H.S. WISLEY is the most visited Tourist attraction in S.E. where attendance numbers expect to rise to 500,000/annum this [illegible word] and other high attendance events at R.H.S. have not been taken in to consideration
8. The increase in traffic expected by local employment will be down-right dangerous on these narrow roads and lanes.
9. Commuter traffic to Woking Railway Station at present hazardous will become even more so.
10. The future timescale at the VOR Beacon is unclear and at present is at present a constraint on any possible building height etc.
11. Heritage asset UPTON FARM now abuts the site with a negative impact.
12. The increased area of this site presents a negative view to SURREY HILLS (AONB.)
13. Incorrect changes to site boundaries that are also not identified properly.
14. Changes to Green Belt boundary at the eastern end now encloses site of high archaeological impact
15. Unsuitable proposed development in flood zones 2-3.
16. Failure to recognize the impact on local countryside of new Buildings!!
17. Why has the Council failed to remove this site from the “LOCAL PLAN” despite receiving 1000s of letters of “OBJECTION” from local residents and statutory local consultees!!!
18. There is no mention of the inclusion of A35 on the effect on sewerage capacity.
19. Poor air quality is a real problem in this area that has not been addressed in fact one of the “AIR QUALITY SENSORS” has gone missing mysteriously in recent times!!
20. The Council has paid no heed to the constraints of the GREEN BELT. infrastructure damage.
21. There seems to be no regard to the bad affects of pollution, nitrogen deposition.
22. The Council has in general paid little attention to the genuine fears and concerns of local residents, and so many experts opinions whos views they do not agree with. In short they appear to be on the side of anybody except the local residents they are supposed to represent and defend

In conclusion for the afore mentioned reasons and many others this plan is wrong in so many way’s and is a total waste of time and money.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2258  Respondent: 15380865 / J Tagg  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/7513  Respondent: 15380929 / Elizabeth Coates  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the planning application A46 Normandy & Flexford’s ‘strategic site’ under the GBC's Local Plan.

The reasons for my objection are as follows:

1) The development of 1,100 houses is simply excessive. This development alone will double the population of the village and is clearly of a grossly inappropriate scale.

2) The destruction of the green belt and of village life. I moved to the area when the 2014 consultation was underway. The area currently being considered for development was a safeguarded area and was not removed from greenbelt. The attraction of moving here was for village life, the openness of the village and the views. All of these will be destroyed by the proposals and exceptional circumstances of why the development is needed have not been demonstrated.

3) This is against the wishes of the village residents. My understanding is that this development should reflect the needs and priorities of the community. The proposal does not reflect the needs and priorities of the community and is against the wishes of the village residents and so the application should be turned down.

4) The local infrastructure simply cannot support these extra houses. This will put huge pressure on the doctors surgery, primary school, sewer system, gas supply, water supply/drainage and the roads will be chaos. None of which seem to be in line for upgrades to cope with the additional population.

5) The proposed development would lead to traffic chaos. At peak times especially the following areas simply will not be able to cope:
   1. The A323 around Wood Street barely copes as it is.
   2. The A323 towards Ash already suffers from long queues, in part due to the railway crossing at Ash and the narrow roads through Ash.
   3. Westwood Lane is single track under the railway bridge. If the majority of the access to the new development is from Westwood Lane it will bear the brunt of the additional traffic.
   4. The junction of Wanborough Hill, the B3000 and the A3 is already extremely congested often backing all the way back to the junction of the A3 at Compton.
   5. Due to the constraints of the railway bridge on Westwood lane, large vehicles such as Lorries and double decker buses are already routed down Glaziers lane an unclassified road and one that already backs up easily with any problems on the A3 or the A31.
   6. The junctions of Westwood lane and Glaziers Lane with the A323 are already problem areas in peak times. A development of the scale proposed with access mainly off Westwood lane and Glaziers lane will compound the problem to an unacceptable level.

It is ridiculous to assume that the majority of the additional traffic from the development will go by rail. The majority of traffic will go by road. It will cost the council a fortune to upgrade all of these roads to avoid traffic chaos.

6) The volume of traffic already makes walking to Wyke School dangerous. The additional traffic will make it even worse, the pavements are not on both sides of the road are narrow and badly maintained and most of the pavements are unlit.

7) The development and resulting traffic will cause excessive air and noise pollution.

8) The destruction of ancient woodland and wildlife habitats. The proposed development contains several important wildlife habitats and ancient woodland which can’t be replaced or maintained by ‘wildlife corridors’. Also part of the charm of living in a village is the wildlife. A development of this size, along with the resulting air, noise and light pollution, will have terrible consequences on the local wildlife.

9) The exceptional need for a secondary school has not been proven. The local primary school is only 1 form entry and therefore the remaining 6 forms would need to brought in from outside areas. This is not sustainable. The majority of the pupils will come by road not by train and even if many they are bused in the local road can’t cope with that increased traffic pressure.
10) **Merging of residential areas.** This proposal effectively joins Normandy and Flexford together. The green belt is designed to stop this happening so that the character of our countryside can be preserved. With large developments already underway in Ash and Tongham, the west of the borough threatens to merge into one large urban sprawl.

11) **Increased flooding.** Much of the area in the A46 site is prone to flooding already. An increase in concrete will exacerbate this and lead to increased problems for existing residents let alone the new houses which are very likely to be affected.

In conclusion, I object to the plans for the A46 Normandy & Flexford’s ‘strategic site’. I trust that this proposal will be rightly rejected.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp173/288  **Respondent:** 15380929 / Elizabeth Coates  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Normandy and Flexford

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I support the removal of sites A46 and A47 from the Local Plan as there were no exceptional circumstances justified to remove this area from the green belt. Also the developments were excessive and the local infrastructure would not have been able to cope.

However, there are still a number of additional homes being built within the vicinity of Normandy which will put increased pressure on the road infrastructure.

1. The A323 around Wood Street barely copes as it is.
2. The A323 towards Ash already suffers from long queues, in part due to the railway crossing at Ash and the narrow roads through Ash.
3. Westwood Lane is a cut through from the A31 with a single track under the railways bridge.
4. The junction of Wanborough Hill, the B3000 and the A3 is already really bad.

The GBC need to ensure that appropriate infrastructure is put in place to ensure the roads can cope with the additional population.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/2261  **Respondent:** 15381025 / Nick Coates  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A46
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the planning application A46 Normandy & Flexford’s ‘strategic site’ under the GBC's Local Plan.

The reasons for my objection are as follows:

1) **The development of 1,100 houses is simply excessive.** It is doubling the size of the village!

2) **The destruction of the green belt and of village life.** The area currently being considered for development was a safeguarded area and was not removed from greenbelt following the 2014 consultation. The attraction of living in Normandy is to have a village life, the openness of the village and the views. All of these will be destroyed by the proposals and exceptional circumstances of why the development is needed have not been demonstrated.

3) **This is against the wishes of the village residents.** My understanding is that this development should reflect the needs and priorities of the community. The proposal does not reflect the needs and priorities of the community and is against the wishes of the village residents and so the application should be turned down.

4) **The local infrastructure simply cannot support these extra houses.** This development will put huge pressure on the doctors surgery, primary school, utilities and the roads will be chaos. In rush hour the following areas simply will not be able to cope:
   
   1. The A323 around Wood Street barely copes as it is.
   2. The A323 towards Ash already suffers from long queues, in part due to the railway crossing at Ash and the narrow roads through Ash.
   3. Westwood Lane is single track under the railways bridge. If the majority of the access to the new development is from Westwood Lane it will bear the brunt of the additional traffic. It will be chaos with the single track section and can double decker busses even get under it to reach the school?
   4. The junction of Wanborough Hill, the B3000 and the A3 is already really bad.

   It is a ridiculous assumption that the majority of the additional traffic from the development will go by rail. The majority of traffic will go by road. It will cost the council a fortune to upgrade all of these roads to avoid traffic chaos. The council are being short sighted by even considering this proposal.

5) **The additional traffic will make walking to Wyke school dangerous.** There aren’t pavements on both sides of the road and most of the pavements are unlit.

6) **The development and resulting traffic will cause air and noise pollution.**

7) **If a secondary school is needed, then this should simply be built without the rest of the development.** If a secondary school is needed, this is what taxes are for. The school should simply be built without the condition of completely destroying the green belt by building 1,100 homes.

8) **This proposal from the developer is akin to the government/council accepting a bribe.** If the developer was giving £10m of cash (instead of an asset of a free school) to “get this development through” people would end up in jail.

9) **The destruction of ancient woodland and wildlife habitats.** To destroy or endanger ancient woodland is simply inexcusable. Having this is part of the charm of living in a village is the wildlife. A development of this size, along with the resulting air, noise and light pollution, will have terrible consequences on the local wildlife.

10) **This isn’t the only proposal to build houses in the area.** There are a number of proposals to build thousands of houses all around the area. It would awful if all of the land between villages is in filled with houses as all of the residential areas together will be linked together. The green belt is designed to stop this happening – so stop building on the green belt!
In conclusion, I object to the plans for the A46 Normandy & Flexford’s ‘strategic site’. I trust that this grossly excessive proposal will be rightly rejected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/289  Respondent: 15381025 / Nick Coates  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Normandy and Flexford

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I support the removal of sites A46 and A47 from the Local Plan as there were no exceptional circumstances justified to remove this area from the green belt. Also the developments were excessive and the local infrastructure would not have been able to cope.

However, there are still a number of additional homes being built within the vicinity of Normandy which will put increased pressure on the road infrastructure.

1. The A323 around Wood Street barely copes as it is.
2. The A323 towards Ash already suffers from long queues, in part due to the railway crossing at Ash and the narrow roads through Ash.
3. Westwood Lane is a cut through from the A31 with a single track under the railways bridge.
4. The junction of Wanborough Hill, the B3000 and the A3 is already really bad.

The GBC need to ensure that appropriate infrastructure is put in place to ensure the roads can cope with the additional population.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1240  Respondent: 15381089 / Tim Poyntz  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
22. APPENDIX C

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1238  Respondent: 15381089 / Tim Poyntz  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

2. Having determined housing need the Council was entitled to consider constraints before determining the housing numb I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

3. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NP The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1241  Respondent: 15381089 / Tim Poyntz  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
20. APPENDIX D

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
20. POLICY A25 - Gosden Hill Farm

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents 2015
- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays Surrey Fire and Rescue deploy

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.
Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

21. POLICY A43 AND A43a– Garlick’s Arch

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.
Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
8. POLICY D3

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4942  Respondent: 15381089 / Tim Poyntz  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

15. POLICY D3

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4943  Respondent: 15381089 / Tim Poyntz  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
16. POLICY D4

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4931  Respondent: 15381089 / Tim Poyntz  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

1. POLICY E1

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E2

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt. Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

7. POLICY E5

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses,
which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4945  Respondent: 15381089 / Tim Poyntz  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

18. POLICY E6

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tours. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.
1. To rule out the redevelopment of scarce rural hotel sites (e.g., Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4941  Respondent: 15381089 / Tim Poyntz  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

14. POLICY E7

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion. The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4939  Respondent: 15381089 / Tim Poyntz  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
12. POLICY H1

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog's Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
13. POLICY H2

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price? As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4944  Respondent: 15381089 / Tim Poyntz  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

17. POLICY H3

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are
available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4936  Respondent: 15381089 / Tim Poyntz  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

9. POLICY II

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy II)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads. Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.
I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems. With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable. Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.
There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4937  Respondent: 15381089 / Tim Poyntz  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

10. POLICY I2

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2) I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4938  Respondent: 15381089 / Tim Poyntz  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
11. POLICY I3

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4929  Respondent: 15381089 / Tim Poyntz  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the
Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/4946  **Respondent:** 15381089 / Tim Poyntz  **Agent:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

19. SITES - POLICIES A1 TO A57

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constrain. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4930  Respondent: 15381089 / Tim Poyntz  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4. POLICY P4

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the
Flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

Re: Responses to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

1. POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.
The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4928  Respondent: 15381089 / Tim Poyntz  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri- borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that...
the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data.

There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it.

The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper account of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints.
It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/859  Respondent: 15381089 / Tim Poyntz  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Questions posed by Guildford Borough Council as part of its consultation. Questions from GBC

24.A. Question 1: The evidence base and submission documents

The Proposed Submission Local Plan: strategy and sites is based on up-to-date evidence. The evidence base documents contributing to the preparation of the plan are listed in Appendix D and can be found on our website (links open in a new window).

Do you agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant?

ANSWER
I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

2. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** SQLP16/860  **Respondent:** 15381089 / Tim Poyntz  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):**

24.A. Question 2: Legal Compliance

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole is legally compliant? Please provide the following information being as precise as possible:

- why you consider it is or is not legally compliant and
- what change(s) (if any) you consider necessary to make it legally compliant, explaining why this is the case

**ANSWER**

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.
The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<thead>
<tr>
<th>Comment ID: SQLP16/861</th>
<th>Respondent: 15381089 / Tim Poyntz</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

24.A. Question 3: Soundness

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound? Please provide the following information being as precise as possible:

- why you consider it is or is not sound and
- what change(s) (if any) you consider necessary to make it sound, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

2. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

3. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

1. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham.

2. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework.

1. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.

1. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

2. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.

1. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

1. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

2. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

3. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

1. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.
The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/862  Respondent: 15381089 / Tim Poyntz  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

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24.D. Question 4: Duty to cooperate

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate? Please provide the following information being as precise as possible:

- why you consider it has or has not complied with the Duty to cooperate and
- what change(s) (if any) you consider necessary to make it comply with the duty to cooperate, explaining why this is the case

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough. The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan. Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages. This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. **APPENDIX C**

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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1. **APPENDIX D**

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1243  Respondent: 15381249 / Helen Poyntz  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

2. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

3. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2265  Respondent: 15381249 / Helen Poyntz  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

20. POLICY A25 - Gosden Hill Farm

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  
  Surrey Fire and Rescue deployed.

2016
Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.
If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPS16/2266  **Respondent:** 15381249 / Helen Poyntz  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

1. **POLICY A43 AND A43a – Garlick’s Arch**

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)
The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.
This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4959  Respondent: 15381249 / Helen Poyntz  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY D3

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4967  Respondent: 15381249 / Helen Poyntz  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY D3

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/4968  Respondent: 15381249 / Helen Poyntz  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY D4

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4956  Respondent: 15381249 / Helen Poyntz  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E1

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and
general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4957  Respondent: 15381249 / Helen Poyntz  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E2

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. **POLICY E5**

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

1. **POLICY E6**

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is
likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for “overdevelopment”/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.
4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4966  Respondent: 15381249 / Helen Poyntz  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E7

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes
could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/4964</th>
<th>Respondent: 15381249 / Helen Poyntz</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H1

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students are accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.
It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/4965  **Respondent:** 15381249 / Helen Poyntz  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

1. **POLICY H2**

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/4969  **Respondent:** 15381249 / Helen Poyntz  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H3

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses through all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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1. POLICY I1

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists pass through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable
(and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:


Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY I2

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).
Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4962  Respondent: 15381249 / Helen Poyntz  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY I3

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4950  Respondent: 15381249 / Helen Poyntz  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. **POLICY P2**

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.
This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4972  Respondent: 15381249 / Helen Poyntz  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. SITES - POLICIES A1 TO A57

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. POLICY P4

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these...
adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN Ire not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Questions posed by Guildford Borough Council as part of its consultation.

Questions from GBC

24.A. Question 1: The evidence base and submission documents

The Proposed Submission Local Plan: strategy and sites is based on up-to-date evidence. The evidence base documents contributing to the preparation of the plan are listed in Appendix D and can be found on our website (links open in a new window).

Do you agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant?

ANSWER

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up-to-date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
24.B. Question 2: Legal Compliance

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole is legally compliant? Please provide the following information being as precise as possible:

- why you consider it is or is not legally compliant and
- what change(s) (if any) you consider necessary to make it legally compliant, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/865  Respondent: 15381249 / Helen Poyntz  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

24.C. Question 3: Soundness

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound? Please provide the following information being as precise as possible:

- why you consider it is or is not sound and
- what change(s) (if any) you consider necessary to make it sound, explaining why this is the case.

ANSWER
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and
foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.

11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/866  Respondent: 15381249 / Helen Poyntz  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

24.D. Question 4: Duty to cooperate

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate? Please provide the following information being as precise as possible:

• why you consider it has or has not complied with the Duty to cooperate and
• what change(s) (if any) you consider necessary to make it comply with the duty to cooperate, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.
The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPS16/2267  **Respondent:** 15381441 / Gillian Ward  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4). I object to the inclusion of the land at Garlick's Arch, Send Marsh I Burnt Common and Ripley (A43).

Garlick's Arch is protected from development as Green Belt. There are no exceptional circumstances which allow for it's removal from the Green Belt (Policy P2). Central Government state clearly that housing need is not an exceptional circumstance.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPP16/4980  **Respondent:** 15381441 / Gillian Ward  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
6). Increase in Traffic.  

The inevitable increase in traffic as a result of more housing in this area will create more pollution in the form of exhaust gases and noise which will have an unhealthy effect on residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2). I object to not protecting the Green Belt (Policy P2).

Removing Ripley, Send and Clandon from the Green Belt is unacceptable. These are villages that have always been surrounded by agricultural land that gives them their character. Whilst increasing population requires further housing development, large scale plans such as Wisley airfield and Garlick's Arch are inappropriate in such areas and removing these villages from the Green Belt is just an "underhand way" to allow such developments and more in the future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
3). I object to the congestion that the development will cause to the local village roads and the lack of road structure improvement (Policy P3).

The roads around Glandon, Send and Ripley are already congested with frequent long lines of traffic queuing. Narrow roads such as Newark Lane and Rose Lane already struggle with the present amount of traffic. Crossing the road as a pedestrian in these villages can be dangerous. Walking from Grove Heath North to the High Street in Ripley requires crossing Rose Lane often between cars waiting in this road turning left or right into the High Street. This crossing of Rose Lane is not pedestrian friendly and one day someone will get hurt or killed. Any further increase in traffic will only make matters worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/4974 **Respondent:** 15381441 / Gillian Ward **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I consider the Local Plan as the development proposed is not sustainable (Policy S1).

13,860 new houses proposed is too many for this area. It will have a negative impact on villages such as Glandon, Send and my village Ripley. With no railway station in Send or Ripley, limited bus service, developments at Wisley Airfield and Garlick's Arch will require nearly all adults to own or use a car. I am already unable to park my car in Ripley for a short period to go shopping as all parking spaces (often including Ripley Green) are full. The parking area where White Hart Court used to be has been reduced and is always full. How can more cars help this situation?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/4978 **Respondent:** 15381441 / Gillian Ward **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
5). I object to the Borough Wide Strategy (Policy S2).

The proposal by Guildford Borough Council for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

The proposals are for too much development in the north east of the borough (Wisley, Ripley & Send). I understand 36% of all the Plans new housing is proposed in this area, which has only 11% of the existing housing.

Ultimately all this new housing will merge Wisley, Ripley, Send, Glandon all together and they will cease to be villages and become one large urbanisation!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Respondent: 15382049 / Ian Ward</th>
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<td>I consider the Local Plan as the development proposed is not sustainable (Policy S1)</td>
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<td>13,860 new houses proposed is too many for this area. It will have a negative impact on villages such as Glandon, Send and my village Ripley. With no railway station in Send or Ripley and limited bus service, developments at Wisley Airfield and Garlick's Arch will require nearly all adults to own or use a car.</td>
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<td>I am in charge of Glandon railway station which has 150 car park spaces. This car park is already regularly full on a working day (Monday to Friday). A number of these cars come from the Effingham Area where Effingham car park is smaller and always full Monday to Friday.</td>
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<td>More concentrated development in this area will mean no where for these car owners to park, particularly should they want to travel to London by train.</td>
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<td>Please consider my comments and I ask that the Plan is amended accordingly.</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write further to the publication of the above document and write to express my objection to elements of its contents.

My principle overarching objection is the proposal to take a number of Surrey villages out of the Green Belt, and East and West Horsley in particular. This proposal in particular will have "urbanisation" implications far beyond those envisaged by the mantra that more houses must be built in the Borough. Whilst fully accept the need to provide additional housing in the Borough, I do not agree with the drastic actions of removing the Green Belt status in order to be able to provide large scale developments that would otherwise be subject to far greater planning scrutiny.

1. I object to your proposal to remove the Horsleys from the Green Belt. The Green Belt was established for a very defined purpose by statute. It was designed to prevent urban sprawl and to a large extent has succeeded in doing this. It is there for the benefit of not just our generation but those that succeed us. This area not only contains many areas of Outstanding Natural Beauty but also Sites of Special Scientific Interest. The Green Belt enables these areas to be protected in order that the Guildford/Leatherhead/Dorking area does not become a suburban sprawl such as Hersham/Weybridge/Walton on Thames.

2. Large numbers of people visit the Surrey Hills area because of its stunning beauty, villages and leisure opportuni. These visitors in turn support many businesses both large and small whose livelihood depends upon the area retaining its rural charm. You simply have to remember that these people are your citizens, your ratepayers and your electorate and changing the nature of their environment will potentially destroy the uniqueness of their businesses.

3. I object to the volume of housing, and associated density of construction, which is currently proposed in the Horsleys and is completely out of keeping with their village status. The proposal to build 180 houses in East Horsley and 411 in West Horsley is completely disproportionate to the housing stock currently in existence. There has not been any detailed study undertaken proving the need for this level of housing in these locations, the size and style of the proposed houses or the impact on the surrounding infrastructure.

4. I object to the proposal as many of these sites do not reflect the level of infrastructure in place to support such a volume of housing, from schools to medical facilities, shops, bus services, train station parking and We have seen how many villages in the area have been blighted by the bolt on Council Estates of the post war years - dumped on village back land with no regard to the architectural merits of the development, the local amenities on offer or the employment of the proposed residents. Each site should be considered on its own individual merits under the existing planning regime which has been designed to protect the environment of our rural life and given its particular circumstances.

5. I object to the proposal to build 100 houses on site A39 in East Horsley as it is fundamentally The plan already recognises that the site is in a flood plain and notes that the flood risk needs to be reduced and that accordingly there is to be no greater flood risk to anywhere else. Surely by interfering with the flood plain in this location can only transfer the flood plain impact somewhere else? That may be downstream of the site or onto adjoining properties. If there is no interference with the flood plain at the site doesn't become viable for 100 houses. The existing proposal by Cateby Land to develop 100 affordable homes here simply does not sit comfortably with any sustainable, accessible or employment rationale. It is building the wrong types of houses in the wrong place.

6. I also do not believe that the Council has given sufficient regard to where all these new inhabitants are going to. There is little or no employment in these villages, there is very little bus transport, the railways are currently crammed in rush hour with no room for extra capacity and the station car parks are not big enough to cater for more cars. And yet how are people meant to get to work in Guildford, Woking and London as the primary employment centres? The answer will be by car, whether th is be by way of a short journey to the station (where they will end up parking on the streets) or a full journey into Guildford (which is already ram med in rush hour).
I cannot see how this can sit comfortably with the Council's Green agenda. The Council certainly will not be able to force the bus and train companies to extend their services as these are now privately owned businesses operating for profit.

1. I disagree with the Council’s housing projection of a need for 693 houses per year (identified in the SHMA) for the period 2013-2033 when an independent report prepared by N MSS for Guildford Resident's Association in June 2016 identifies that the Objectively Assessed Housing Need is nearer to 51. This reinforces my view that the statistical basis for the draft Local Plan is fundamentally flawed.

1. I object to the Council's failure to unlock the development potential of brownfield sites in the Borough and the volume of currently unoccupied residential properties in the Borough should be given a greater priority in the search for developable land before ruining the environment, livelihood and well-being of a unique area of Britain.

Remember, there will be no opportunity to undo any development resulting from these proposals. You will not be able to wind back time.

I re-iterate my unreserved objection to the proposals as set out in the above document.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1250  Respondent: 15382529 / Reuben Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

19. I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick's Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1248  Respondent: 15382529 / Reuben Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
1. I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)
   - The “objectively assessed need” figure of 693 homes a year is too high.
   - A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
   - The current SHMA inflates the proposed housing figure due to
     - failure to correct for errors in the historical data for international migration flows,
     - issues with the way it considers students and affordability and
     - flaws in the method for estimating the number of homes needed to support job growth.
   - It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
4. I OBJECT to Gosden Hill development being in the Local Plan. The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2272  Respondent: 15382529 / Reuben Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

5. I OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brownfield site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)
Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2273  Respondent: 15382529 / Reuben Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

18. I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5012  Respondent: 15382529 / Reuben Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

13. I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

10. **I OBJECT** to the sustainable employment policy (Policy E1)

   If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

   The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

11. **I OBJECT** to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

   Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

   There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

12. I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that
order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

17. I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID:  PSLPP16/5016  Respondent:  15382529 / Reuben Lee  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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20.  POLICY H3 – Rural Exception Homes

I OBJECT  This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID:  PSLPP16/5013  Respondent:  15382529 / Reuben Lee  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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14.  I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy II)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.
Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

15. I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5005  Respondent: 15382529 / Reuben Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

6. I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
2. I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested.

These narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians AND you have given no consideration to this point.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

16. I OBJECT to poor air quality concerns (Policy 13)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT categorically with the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is ill thought out unproven and unnecessary.

Please find below my objections

1. I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to any proposal to take land out of the Green Belt as is suggested with villages such as Ripley, Send and Clandon as well as sites of Wisley Airfield (A35) and Garlick’s Arch (A43). The National Planning Policy states clearly that it requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt and that housing need is not such an exceptional circumstance.

There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s
identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5006  Respondent: 15382529 / Reuben Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

7. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is no way sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5007  Respondent: 15382529 / Reuben Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

8. I OBJECT to the Borough Wide Strategy (Policy S2)

a. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

b. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1254  Respondent: 15382977 / Johnathan White  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Fairlands
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Reference 16/P/01397-Fairlands Farm

I also object to this application.

Again the land is Green Belt. The arguments in the application that there are "highly exceptional" reasons is without justification.

I object on the grounds of increased traffic & infrastructure as per my objection to the Keens Lane development and there are no exceptional circumstances to be applied to this application.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to strongly object to the Guildford Plan Planning Policy for the following reasons:

The large number of homes proposed cannot be justified and conflicts with the research evidenced and published by Guildford Residents Association and takes insufficient account of major transport and infrastructure problems. Guildford Borough Council needs to be transparent and explain its calculations used to produce figures.

I also wish to comment on 2 areas, specifically:

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I strongly object to the increase in housing numbers on the land off Keens Lane, Worplesdon (Site A22) in the GBC Local Plan believe this is inappropriate for three main reasons:

1. The area is Green Belt, which should be retained for future generations and to stop urban sprawl. This reason alone should be sufficient. This alone should have prevented it's inclusion in the first instance in line with other proposed site.

2. Keens Lane and Tangleway lane are narrow lanes and traffic is already an issue where onto busy Worplesdon Road and Aldershot Road via Gravetts lane. Parts of these lanes are little more than single track with no passing places and are used widely by walkers and horse riders. Any further increase in traffic could endanger the public and horses alike & put pressure on the already traffic saturated roads in the area.

I object on the grounds of increased traffic & infrastructure as per my objection to the Keens Lane development and there are no exceptional circumstances to be applied to this application.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2282  Respondent: 15383041 / Danielle Forrest  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the draft Local Plan for the following reasons:

I feel quite strongly that I want to keep our local Green Belt land. We are very lucky to live in an area that is so beautiful with gorgeous views. I have not heard that there are any exceptional circumstances for this to be ruined. It is not only for myself but for any children I might have. Planting a few trees won't re-create an interrupted landscape and importantly all this development would cause many rare and protected species to die.

I love Ockham the way it is. I don't want to be selfish though and say we shouldn't build any more houses or make room for any more people to move from London and come to the outskirts of Guildford - but to do so there needs to be a train station close by. I have seen how full Horsley and Effingham stations are. None of the local stations are within walking distance for anyone so this means an inordinate amount of extra cars on our little lanes.

Anyway, I appreciate the old Airfield is a large area and probably something has to happen to it at some point but it definitely shouldn't be included as a potential site for a large scale residential housing development because a) it is green belt land and b) our Ockham/Horsley area couldn't cope.

I hope you will give my objections your full consideration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2285  Respondent: 15383169 / Henry Forrest  Agent:
I OBJECT to the draft Local Plan for the following reasons:

The reasons are: that the proposal is an enormous encroachment on the Green Belt and will change the way our nearby countryside looks for myself and for future generations. (By the way, I thought Green Belt land was "Sacrosanct" and at the very least - an absolute last resort. I haven't seen any paperwork that this is the case.

Apart from my parents moving me away from what I love about Ockham my biggest concern is that if over 2,000 houses were built this probably means over 5,000 people. I don't know how many extra cars that will be but I do know that my Mum and Dad are always stuck in traffic already. Lots of the roads around here are single lane - I cannot see how they can be made bigger without knocking existing houses down.

We live in Ockham itself so we can't walk home from the station and need our parents to pick us up. I am told that there are no plans to build a new railway station. So how are all the people going to get to work? Horsley and Effingham stations are already super-busy and there could be loads and loads of cars on our narrow lanes. Have the people who carried out this research to put this site in the plan not seen all the local roads closed and us diverted when we have heavy rainfall!

Anyway, I will keep my objection letter brief and to the point - a strong "no" to our village being included for a large scale housing development. The village couldn't cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

The lack of need for a secondary school

According to Mr Spooner, a hospital or a school overcomes greenbelt protection however there is no legal evidence to support this statement. Also, the need for a new secondary school has not been proven with regard to existing pupils. There are many schools in the Guildford area that are able to accommodate for an increased demand in pupils and it seems unnecessary to build a school in a rural, mostly greenbelt area when there is no pressing demands for a school to be built.

I hope that you take these points on board and listen to what the local people have to say about the matter.
Traffic chaos

One of the main concerns that I have is the traffic chaos that the development will create. My home is very close to a very dangerous single lane railway bridge, were some cars drive at ridiculous speeds through the bridge On a regular basis, traffic is held up waiting for cars to pass through the bridge. If the secondary school is built, the amount of traffic created by dropping off and picking up kids would increase drastically and the single lane railway bridge would not be able to accommodate for the amount of vehicles that are on the road, creating severe delays, even if measures such as a traffic light system were introduced. Also, the amount of air pollution in this rural area would soar and the rural reputation of the area would be ruined.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5031  Respondent: 15383425 / Christine Fordham  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It would make logical sense to build on existing Brownfield site first rather than destroying the valuable Greenfield sites. There are many Brownfield sites in Guildford city centre created from redundant office spaces and this area could be used to build extra houses, where services and transport links are close by and where there are many local secondary schools nearby. This would be a more sustainable solution as you can regenerate disused areas rather than depleting Greenfield sites. Furthermore, the roads in the centre are able to accommodate Increased traffic rather than creating more traffic in a rural area with a single lane underpass. It is vital that the Flexford and Normandy area is kept as a rural, spacious area and that the greenbelt areas are not built on.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Destruction of rural environment

It will destroy the rural core out of the area and make the area too densely populated for its capacity. Green belt land will be transformed into an urban sprawl, creating a gradual suburbanisation process, causing even more congestion in the area. This is breaking the promises made in the election that the green belt would always be protected and the decisions would be made by the local people. Also, valuable pasture and farmland will be lost. 2000 sq kilometres of valuable agricultural land has been lost to greedy developers and we don't want this total to rise.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Planning Reference 16/P/01397 - Fairlands Farm

I also object to this application.

Again the land is Green Belt. The reason given for dropping the nearby Uddington Hall and Fairlands sites from the Draft Local Plan was because of the "high sensitivity Green Belt". The same should apply to the Fairlands Farm site. The arguments in the application that there are "highly exceptional" reasons has no substance and should be discounted. The community benefits are arguably greater as the development exists today than for the proposed development. To argue that Guildford does not have five years of housing supply is to disregard the Regulation 19 consultation that ends this month. The legislation cannot have intended to allow this sort of opportunism.
I also object on the grounds of increased traffic and infrastructure pressure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2287  Respondent: 15383745 / Bernard Callanan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A22

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site A22

I strongly object to the inclusion of land off Keens Lane, bordered by Tangle Lane Worplesdon (Site A22) in the GBC Draft Local Plan for the proposed development of 140 homes and a care home and believe this is inappropriate for three main reasons:

1. The area is Green Belt, which should be retained and not built. Surrey County Council is historically the creator of the Green Belt and has previously agreed to use its power to protect Surrey's Green Belt and to support the National Planning Policy Framework (section 9- paragraphs 79 to 92) and the Government's policy of protecting the Green Belt and that any Green Belt development in the County is in line with the needs and wishes of Surrey residents. I can't say I have heard any Surrey residents advocating the development of Greenbelt land. Indeed there is a feeling of anger locally that this should even be considered.

This point alone should be sufficient to remove this site from the local plan.

1. Keens Lane is a narrow lane as is Tangle Lane which borders the site, parts of these lanes are little more than single track, prone to flooding and used widely by walkers and horse. To increase traffic levels will potentially endanger human life which must be deemed a risk one should not take and I wish to object on the grounds of road and infrastructure and traffic pressures.

2. The proposed development site is close to Whitmoor on and a Site of Special Scientific Interest, and would have a damaging effect on ecology and wildlife. It is also bounded by Broadstreet Common. The open nature of Worplesdon should be retained. The land is part of the important wildlife corridor between Whitmoor and Broadstreet Commons. As such, developing the site would conflict with NPPF paras 113, 117, 118, and 119.

Historical previous applications in the area have been turned down by the inspectorate for the following reasons:

"The proposed development, in my opinion, would further impair the efficiency of both the A323 and A322 which, as principal roads connecting Guildford to the M3 and the major growth area, must be safeguarded .....".

In 1983, the County Engineer wrote to the then MP concerning the Surrey Structure Plan:

"Accordingly the County Council as Highway Authority will seek to prevent the grant of any planning permission which would significantly increase traffic to the south of Liddington Hall". In 1985, in spite of the above, an attempt was made by the County Council to build on Uddington Hall Farm, which at that time they owned. The Inspector recommended: "In my judgement, the discharge to A3222/A323 of traffic from 700 dwellings additional to that
arising from expected development at Tilehouse, Stoughton and from general growth of traffic would add unacceptably to prevailing congestion and danger on the main framework roads."

In 2003, the Officer Report to the Executive on the Deposit Draft Surrey Structure Plan 2002 stated:

"The findings thus far suggest that the transport impacts associated with the north west community [the Liddington Hall site] would be significant and difficult to resolve."

With traffic levels seemingly ever increasing, these reasons for not including this site are even more relevant today and I wish to include them in my objection.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5032  Respondent: 15383745 / Bernard Callanan  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to object to the Guildford Plan Planning Policy (Local Plan Consultation) The huge number of homes proposed takes insufficient account of major transport and infrastructure problems.

How did GBC calculated these figures which conflict with those published by Guildford residence Association? Transparency is essential. Conflicting evidence gathered prior to Brexit (which should also be factored in) shows the figure for new home should be 510 per year from 2013 to 2033.

There are two areas in particular that I would like to focus on:

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1257  Respondent: 15383937 / Laurence White  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Fairlands

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I also object to this application.

Again the land is Green Belt and therefore not to be used development The arguments in the application that there are "highly exceptional" reasons cannot be justified.

I object on the grounds of increased traffic & infrastructure as per my objection to the Keens Lane development and there are no exceptional circumstances to be applied to this application.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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I strongly object to the inclusion of land off Keens Lane, Worplesdon (Site A22) in the GBC Draft Local Plan for the proposed development of 140 homes and a care home and believe this is inappropriate for three main reasons:

1. The area is Green Belt and therefore should be retained as per guidance from Surrey County. This reason alone should be sufficient.
2. Keens Lane and Tangley lane are narrow lanes with no passing places, prone to flooding and are regularly used by walkers, joggers, and horseriders are little more than a single track with no passing. Any further increase in traffic could endanger these users and inflict misery on the local.
3. The proposed development site is close to Whitmoor Common and a Site of Special Scientific Interest, and would have a damaging effect on ecology and it is also bordered by Broadstreet Common. The open nature of Worplesdon should be retained. The land is part of the important wildlife corridor between Whitmoor and Broadstreet Commons. As such, developing the site would conflict with NPPF paras 113, 117, 118, and 119.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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I wish to object to the Guildford Plan Planning Policy for the following reasons:

The large number of homes proposed has not been explained or justified by Surrey County Council and conflicts with those EVIDENCED and published by Guildford Residents Association. Guildford Borough Council needs to be transparent and explain its calculations used to produce figures.

They also take little account of major transport and infrastructure problems.

I would like to comment on two specific areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/2923  Respondent: 15383937 / Laurence White  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A22

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the increase in housing numbers in Keens Lane, Worplesdon (Site A22) The area is Green Belt and therefore should NOT be included in the plan anyway and should be retained as per guidance from Surrey County Council. This reason alone should be sufficient.

2. Keens Lane and Tangley Lane are narrow lanes with no passing places, prone to flooding and are regularly used by walkers, joggers and horseriders are little more than single track with no passing. Any further increase in traffic could endanger these users and inflict misery on the local residents. I object on the grounds of it being greenbelt, increased traffic & infrastructure as per my objection to the Keens Lane development in the draft plan and there are no exceptional circumstances to be applied to this application.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1259  Respondent: 15384065 / Kevin O'Rourke  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
GBC have failed to provide sound evidence regarding the employment land needs assessment 2015 (ELNA) it is my opinion that the land requirements have been over stated on the basis of questionable information.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPA16/1260  Respondent: 15384065 / Kevin O'Rourke  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As for,

POLICY P2 Send, 
POLICY A43, 30ha, Land at Garlik's Arch,  
POLICY A44. 1.9 ha Lands west of Winds Ridge and Send Hill

It is my opinion that the Ripley / Send areas are NOT in need of further development. Furthermore these areas are of borderline flood risk areas (there is a clue in the road name "Send Marsh Road" and so I believe that these areas must stay within the green belt area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5038  Respondent: 15384065 / Kevin O'Rourke  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I believe that it is self-evident that GBC have not followed the correct planning processes and have not truly taken into consideration the impact these developments will have on our surrounding areas, for instance we already suffer from massive traffic congestion at rush hours and in times of overflow from the A3 road. To further develop our surrounding areas will have a massive impact on traffic and our environment not to mention social needs and services. There are no exceptional circumstances at all to justify these plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Comment ID: PSLPA16/1265</th>
<th>Respondent: 15384161 / Laura Dawson</th>
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**Reference 16/P/01397 - Fairlands Farm**

I also object to this application.

Again the land is Green Belt. The arguments in the application that there are highly exceptional reasons is without justification.

I object on the grounds of increased traffic & infrastructure as per my objection to the Keens Lane development. This development must not be allowed to proceed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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</table>

I strongly object to the inclusion of land off Keens Lane, Worplesdon (Site A22) in the GBC Draft Local Plan for the proposed development of 140 homes and a care home and believe this is inappropriate for three main reasons:

1. The area is Green Belt, which should be retained.
2. Traffic Keens Lane and Tangley lane are narrow lanes and already bottleneck onto busy Worplesdon Road and Aldershot Road via Gravetts lane. Parts of these lanes are little more than single track and used widely by walkers and horse riders. As a horse rider myself I appreciate that any further increase in traffic could endanger the public and horses alike.
3. The proposed development site is close to Whitmoor Common and a Site of Special Scientific Interest, and would have a damaging effect on ecology and wildlife. It is also bounded by Broadstreet Common. The open nature of Worplesdon should be retained. The land is part of the important wildlife corridor between Whitmoor and Broadstreet As such, developing the site would conflict with NPPF paras 113, 117, 118, and 119.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/5060  Respondent: 15384161 / Laura Dawson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to object to the Guildford Plan Planning Policy. The large number of homes proposed takes insufficient account of major transport and infrastructure problems. The numbers used are far too. Guildford Borough Council needs explain its calculations used to produce their figures.

I also wish to comment specifically on 2 areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2924  Respondent: 15384161 / Laura Dawson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A22

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site A 22

I strongly object to the increased housing numbers on the land off Keens Lane, and believe this is inappropriate for three main reasons:
1. The area is Green Belt, which should be retained.
2. Traffic. Keens Lane and Tanglely lane are narrow lanes and already bottleneck onto busy Worplesdon Road and Aldershot Road via Gravettes lane. Parts of these lanes are little more than single track and used widely by walkers and horse riders. As a horse rider myself I appreciate that any further increase in traffic could endanger the public and horses alike.
3. The proposed development site is close to Whitmoor Common and a Site of Special Scientific Interest, and would have a damaging effect on ecology and wildlife. It is also bounded by Broadstreet Common. The open nature of Worplesdon should be retained. The land is part of the important wildlife corridor between Whitmoor and Broadstreet Commons. As such, developing the site would conflict with NPPF paras 113, 117,118, and 119.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1266  Respondent: 15384257 / Marlene Harwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send
### Comment ID: PSLPS16/5867  **Respondent:** 15384257 / Marlene Harwood  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

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1. I object to Send Village being removed from the Green Belt. The Green Belt was meant to be permanent. Central Government gave a clear election promise to protect the Green Belt from any future development. It would be formidable to change your policies now to allow developers to take advantage of our village.

2. I object to building 45 houses at Clockbarn Nursery Send. There is already an existing planning permission to redevelop the Tannery with 64 apartments. This would completely overload Tannery Lane with new traffic. Any more additional development would be dangerous, especially in Tannery Lane and the junction onto send road. Vehicles would use Tannery Lane/ Papercourt Lane which are single access as a shortcut through Ripley.

3. I object to the building of 40 houses and 2 travellers' pitches at Send Hill. It is an inappropriate location because the narrow single width country road provides insufficient access.

Please show my comments to the planning inspector. I hope my objections will be looked upon favourably.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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### Comment ID: PSLPS16/5869  **Respondent:** 15384257 / Marlene Harwood  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

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) I object to building 45 houses at Clockbarn Nursery Send. There is already an existing planning permission to redevelop the Tannery with 64 apartments. This would completely overload the Tannery Lane and the junction onto Send Road. Vehicles would use Tannery Lane / Papercourt Lane which are single access as a shortcut through to Ripley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the building of 40 houses and 2 travellers' pitches at Send Hill. It is an inappropriate location because the narrow single width country road provides insufficient access.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to Send Village being removed from the Green Belt. The Green Belt was meant to be permanent. Central Government gave a clear election promise to protect the Green Belt from any future development. It would be formidable to change your policies now to allow developers to take advantage of our village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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</table>

We support the Guildford Residents Association response and oppose the proposed expansion of Guildford. We cherish to protect the character of the town and surrounding green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We believe the current plan to be deeply flawed. It will lead to unacceptable loss of Green Belt as well as increased traffic congestion. We urge the council to reconsider.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1269  Respondent: 15384449 / Christine Adams  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Fairlands

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Reference 16/P/01397 - Fairlands Farm

I also object to this application.

Again the land is Green Belt. The arguments in the application that there are "highly exceptional" reasons cannot be justified.

I object on the grounds of increased traffic & infrastructure as per my objection to the Keens Lane development and there are no exceptional circumstances to be applied to this application.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2299  Respondent: 15384449 / Christine Adams  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A22

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Site A 22

I strongly object to the inclusion of land off Keens Lane, Worplesdon (Site A22) in the GBC Draft Local Plan for the proposed development of 140 homes and a care home and believe this is inappropriate for three main reasons:

1. The area is Green Belt and therefore should be retained as per guidance from Surrey County This reason alone should be sufficient.
2. Keens Lane and Tangley lane are narrow lanes. Parts of these lanes which are regularly used by walkers, joggers and horseriders are little more than single track with no passing Any further increase in traffic could endanger these users.
3. The proposed development site is close to Whitmoor Common and a Site of Special Scientific Interest, and would have a damaging effect on ecology and wildl It is also bordered by Broadstreet Common. The open nature of Worplesdon should be retained. The land is part of the important wildlife corridor between Whitmoor and Broadstreet Commons. As such, developing the site would conflict with NPPF paras 113, 117, 118, and 119.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5072  Respondent: 15384449 / Christine Adams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to object to the Guildford Plan Planning Policy for the following reasons:

The is no justification for the large number of homes proposed and the numbers are in conflict with those published by Guildford Residents Association. Guildford Borough Council needs to be open and explain its calculations used to produce figures.

They also take insufficient account of major transport and infrastructure problems.

Two particular areas of concern for me are:

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPA16/1271  Respondent: 15384481 / M J Levers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Ash and Tongham
I wish to object to the GBC Local Plan 2016 Policy Numbers A27, A29, A46.

1. Loss of countryside in Ash and Tongham.
   Loss of Green Belt in Normandy. Extra traffic, more congestion, more parked vehicles at local shops, more demand for important services (e.g. doctors, hospital).

2. Congestion caused by Ash railway station A323, whereby the frequency of trains with closure of the gates sometimes for 10-15 minutes, making long queues especially at peak travelling times.

3. The difficulty for pedestrians of crossing the A323 Guildford Road, Ash / Normandy border, as invariably traffic does not keep to 30 and 40 MPH limits and the pedestrians crossing does not serve this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2817  Respondent: 15384481 / M J Levers  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A27

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objection to Policy Numbers A27, A28, A29 and to the map on page 301 (offices) because of lost countryside and amenity, extra traffic, more congestion (entry and exit from Guildford Road, which is already seriously congested daily) more parked cars at local shops, more pollution, more demand for local services.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2818  Respondent: 15384481 / M J Levers  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A28

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Objection to Policy Numbers A27, A28, A29 and to the map on page 301 (offices) because of lost countryside and amenity, extra traffic, more congestion (entry and exit from Guildford Road, which is already seriously congested daily) more parked cars at local shops, more pollution, more demand for local services.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp172/2819  **Respondent:** 15384481 / M J Levers  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

Objection to Policy Numbers A27, A28, A29 and to the map on page 301 (offices) because of lost countryside and amenity, extra traffic, more congestion (entry and exit from Guildford Road, which is already seriously congested daily) more parked cars at local shops, more pollution, more demand for local services.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/2303  **Respondent:** 15384545 / Maureen Biffen  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A21

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I agree with this policy to keep the land for allotment use only.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/1276  **Respondent:** 15385057 / D Munt  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

---
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

WE object strongly to the 2016 draft local plan:-

All erosion of the Green Belt, site A43 Garlicks Arch, site A45 The Tolbot (conservation area)
The amount of development in one area, The Green Belt must stay GREEN for us and our families generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

WE object strongly to the 2016 draft local plan:-

All erosion of the Green Belt, site A43 Garlicks Arch, site A45 The Tolbot (conservation area)
The amount of development in one area, The Green Belt must stay GREEN for us and our families generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
WE object strongly to the 2016 draft local plan:—

All erosion of the Green Belt, site A43 Garlicks Arch, site A45 The Tolbot (conservation area)
The amount of development in one area, The Green Belt must stay GREEN for us and our families generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2325  Respondent: 15385281 / Daniel Tarrant  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object to Policy A25 Gosden Hill Farm, 2,000 houses, on Green Belt Land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2326  Respondent: 15385281 / Daniel Tarrant  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object to Policy A35 Wisley Airfield, 2,000 houses in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2319  Respondent: 15385281 / Daniel Tarrant  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object Policy A42 Clockbarn Nursery. Tannery Lane. 45 Houses.

As Planning permission has already been granted for development of a marina and 64 apartments (Despite strong local objection) in this narrow lane. Further development will only increase traffic in this narrow lane to an already dangerous junction with the A247.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object Policy A43 Garlick’s Arch. Send Marsh/Burnt Common/Ripley.

To the building of 400 houses on this site, Because it was not include in the regulation 18 draft and has not been previously consulted upon.

It is on Green belt, permanently protected by NPPF to prevent the merging of settlements. There are no exceptional circumstances to take this site out of the Green Belt.

The site is covered in Ancient Woodlands, containing trees that have stood since the 16th Century, this area must be conserved for future generations.

I object Policy A43 cont… to the Warehousing and Industrial units which are included in the Policy.

Employment Lands Needs Assessment (ELNA) 2015 shows an 80% reduction from the previous ELNA carried out by GBC in 2013 for employment space.

If Industrial and Warehousing units are required, I question why the Cassidy Slyfield Ltd. North Slyfield site, allocated in 2014 By Guildford Council for Industrial and Warehouse use, was withdrawn from the Local Plan recently.

Surely expanding an existing Brown field industrial area is better than creating a new one on Green Belt Land!

Also heavy traffic would be attracted to Garlick’s Arch site from the M25 and A3, a lot of it using the A247, which is not suited to this traffic!

I object because GBC’s Transport Assessment was not available to Councillors for the vote taken on 24th May for these proposals. It was published on 6th June! Infrastructure requirements must be assessed before major proposals can be voted on.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object Policy A43a, the North facing slip road to from A3 at Send Marsh/Burnt Common

On the grounds of the increase in traffic flow. Our roads already strain to cope with existing levels of traffic. Especially all the approach roads to the A3, and in particular the A247 to and from the Burnt Common roundabout. Which passes a school, a Doctor’s surgery and goes straight through the centre of Send, linking Guildford and Woking. The A247 is 2 way road and not suitable for the high levels and heavy traffic this will create.

I object because GBC’s Transport Assessment was not available to Councillors for the vote taken on 24th May for these proposals. It was published on 6th June! Infrastructure requirements must be assessed before major proposals can be voted on.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object Policy A44. Winds Ridge and Send Hill

I object to this development because it was not include in the regulation 18 draft and has not been previously consulted upon.

It is on Green belt, permanently protected by NPPF to prevent the merging of settlements. There are no exceptional circumstances for taking this site out of the Green Belt.

The site contains documented unsafe landfill waste which is currently vented.
The site is also in a single track lane which is unsuitable for larger vehicle access, which the two traveller pitches would require.

The Lane also the site of the Cemetery, a peaceful place to reflect and remember those who have gone before us.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5101  Respondent: 15385281 / Daniel Tarrant  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object because of the increased pressure on local facilities, Doctors, Schools etc. that 485+ homes would bring to Send. 485 new homes would generate circa half a class, the new amalgamated Send school has no capacity for these pupils.

Send does not need, nor do we want a 25% increase in population.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5098  Respondent: 15385281 / Daniel Tarrant  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As a resident of Burnt Common, Send I object to the following proposed developments:

I object Policy P2. In-setting of Send and Ripley.

I object to taking Send and Ripley out of the Green Belt, I see no exceptional circumstances for this.

Vulnerable land includes, School playing fields and land adjoining the Wey Navigation Canal, a National Trust facility.

Also, Villages to the East of the A3 maintain Greenbelt status.

I object to building on ‘Green Belt’ land, which are the lungs of London. And are meant to prevent Urban spread in the countryside and the linking of settlements. In this case Send, Ripley and on a broader scale to Woking and Guildford.
Local and Central Government gave clear commitment that the green belt would be protected. These proposed
development go against this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>I object because GBC have exaggerated the need for the 13,860 house currently in the local plan. A population increase of 20,000 in the plan period would require just 8,000 homes based on 2.5 soles per habitat.</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object to the disproportionate quantity of proposed development in the Send, Ripley, Wisley, Horsley, Clandon, Merrow Area of the Borough.</td>
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<td>I see these developments solely as commercial gain for the developers and of no benefit to the existing residents of Send, Ripley and the surrounding area. In fact the level of development Proposed will be detrimental to those of us living here.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Attached documents:</td>
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I object because GBC have not followed correct process. Since 2014 GBC has made changes on every major proposed development in Send proposed and have now added a major road junction. Policy A43a.

The 2014 proposal for 430 house in Send was reduced to 185 in April 2016. In May 2016 policy A43 was added with 400 houses and Industrial units. These significant changes require full consultation under Regulation 18. Regulation 19, which GBC are using is not appropriate in this instance.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing with regard to the revised Local Plan proposals for a development of 1,100 homes, a secondary school and six travelling show people pitches on Grade 3 Green Belt agricultural land. The area in which the land sits has been farmed since the 1700s and historic evidence has been found of pre Roman road existence and unearthed Roman Villas were discovered in the surrounding areas in the 1900s. We are blessed that our community is one of only a few remaining rural areas with open fields ancient woodland and rambling footpaths to enjoy, in the TBHSPA area, that hasn't been surrounded by urbanisation and feel that it should remain that way.

This development would change the community into one long urban sprawl, and wildlife will suffer greatly. The few green spaces that would be left would not be able to sustain all the species that we attract throughout the spring - winter seasons such as Yellowhammers, Fire crests and wood pigeons that feed on the grass fields and Buzzards, Kites and Owls that need grassland to hunt for mammals.

Over the last five years I have seen these species increase in numbers, some seen for the first time in our gardens. This land needs to remain in order to support migration and free movement to nearby green spaces in order to breed and expand to create new healthy groups. We have already seen the effects of over urbanisation in our now near non-existent Hedgehog population. Destroying the existing hedgerows will devastate populations of grassland species with no cover or habitat to live in, going against current ethics supported by Farmers that we should be renewing and maintaining our hedgerows.

Our railway embankments are home to a feast of wildlife from Foxes and Rabbits to Parakeets and Longtail Tits, which all migrate into the fields and trees adjacent to this site.

This site also sustains a wide variety of Moths and Butterflies which feed on wild meadow flowers, including the very rare Humming Bird Hawk Moth that migrates here from Europe.

We also have a good population of Deer which are often seen during the day in this area, but there migratory paths are already disappearing and are often victim to road collisions as they are pushed out of their green homes due to another Urban housing development.

I chose to move to the area Twenty Years ago to enjoy the peace and tranquillity of the Countryside away from the Urban sprawl of modern living. I still have that choice and believe that Guildford Borough Council would be doing a great injustice to me and residents of Normandy and Flexford if they allow Taylor Wimpey to go ahead with this development, even with the promise of a new Secondary School, which we are not entirely sure we actually need.

Local villagers pay their taxes and decisions on its future should be decided by us.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to housing at Site A40, particularly the back land site to the SW of Waterloo Farm.

This triangle of land is contained by:
- the main sewer along the campsite boundary
- sewers and surface water sewers, from Nightingale Crescent crossing the site
- flooding and waterlogged ground
- existing mature trees on site and along its boundaries

The inclusion of this land, for two or three houses, would have very little impact on the Council’s housing figures, but would mean the loss of the Green Belt and create undesirable back land development, which would adversely affect the character and setting of Waterloo Farm, an important local historic building. The existing ‘settlement boundary’ along the rear boundaries of Nightingale Crescent should remain.

The Council should also note that it refused an application for 3 houses here in 2014.

One of the reasons for refusal of outline planning permission for the erection of three detached dwellings (access only to be considered), R14/P/00012 on 27 Feb 2014 was:

The proposed development of three dwellings has the potential to increase the risk of flooding in an area with a high risk of surface water flooding. No information has been submitted to demonstrate how the development would successfully mitigate against flooding. This is contrary to policy and G1(6) of the Guildford Borough Local Plan 2003 (as saved by CLG Direction on 24/09/07) and guidance contained in the National Planning Policy Framework.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5106  Respondent: 15385601 / Richard Fletcher  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I also object to the proposed housing sites at A40, A41, A38, A39. These are all important open areas of land which contribute to the rural character of West Horsley. Two adjoin Ancient Woodland and are prone to flooding and are likely to create more surface water flooding along East Lane, Green Lane and Oakham Road.

This amount of development is not sustainable in this area.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5105  Respondent: 15385601 / Richard Fletcher  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The amount of new housing outlined is disproportionate to that proposed elsewhere in the Borough and will swamp this rural area, changing its character and appearance forever. No infrastructure is proposed to support the development, which is contrary to National Planning Policy. The existing infrastructure: schools, roads, medical centre, sewage etc can not cope now. In addition a number of the sites regularly flood.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLP16/5104  Respondent: 15385601 / Richard Fletcher  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objection to Guildford Proposed Submission Local Plan

I object to the removal of East and West Horsley from the Green Belt and the building of 533 new houses in the area (excluding the proposals for the Wisley air field).

No special circumstances have been demonstrated to justify the loss of Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2336  Respondent: 15385633 / Pauline Scholey  Agent:
I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too hi This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC)
- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.
- I object to the detrimental impact on transport, local roads and road I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU permitted Additional traffic will exacerbate
this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

- I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.

- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on the 8th April 2016 on the recommendation of GBC planning officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>15385857 / Bruce Hooper</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

My reasons for objection:

- Object to the removal of the Former Wisley Airfield from the Green Belt. The area serves a vital role in preventing urban sprawl from London and a development would create an urban corridor stretching from London to Guildford.

- Object to the potential harmful impact on transport, local roads and road safety by the suggested development. The result of an additional 2,000 homes would be an estimated 4,000 additional cars together with other vehicles, including HGVs, to service the development.

- The increased traffic would cause congestion and danger on the narrow rural roads in Ockham, Hatchford, Downside and Cobham. Cobham is the closest shopping centre to the proposed development. The village could not cope with the additional traffic and car parking involved in serving some 5,000 additional occupiers at the site and would experience a significant increase in stationary/idling traffic at peak times. Cobham is unable to cope with the traffic at the moment.

- Object to the massive increase in air pollution that would result from the congestion on the small country lanes and the M25 and A3. This areas pollution levels are already above EU permitted levels.

- I live off Between Streets in Cobham and would be affected by the increase in traffic from the above. I can hardly get out of my drive as it is.
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2) I Object To the late inclusion of site A43 Garlicks Arch.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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3) I Object To site A43a the on and off ramp at Burntcommon/Clandon-this will increase traffic problems in the villages, not help them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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4) I object to site A45 The Talbot - this is overdevelopment in a conservation area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/5122  **Respondent:** 15385985 / Sally Almeida  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

All of the above I strongly disapprove of the traffic is already horrendous at any time of the day not only at peak times.

Doctors surgery already stretched to its limit.

Schools full with parents having to look elsewhere not getting into their local schools.

I object to send Village being removed from the green belt.

Send Marsh Rd is already a busy road with fast traffic approaching the junction to the Portsmouth Rd this will be a disaster zone.

I request that my comments are shown to the Planning Inspector who will decide.

I request confirmation that Guildford have received my request.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/5121  **Respondent:** 15385985 / Sally Almeida  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1) I Object To the local plans the development proposed is not sustainable (policy S1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1290   Respondent: 15386017 / Gareth Sinnett   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

22. APPENDIX C

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1289   Respondent: 15386017 / Gareth Sinnett   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. The housing needs assessment is flawed in various respects and overstates housing In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

2. Having determined housing need the Council was entitled to consider constraints before determining the housing. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe
constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

3. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the The Green Belt should trump shortterm considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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23. APPENDIX D

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
- failure to correct for errors in the historical data for international migration flows,
- issues with the way it considers students and affordability and
- flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.
The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2345  Respondent: 15386017 / Gareth Sinnett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

20.POLICY A25 Gosden Hill Farm

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data: 2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head 17 incidents
- Bulls Heads Head to Bennett Way 8 incidents
- Bennett Way to Highcotts Lane 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close 8 incidents 2015
- 21 Oct 2015 – A247 near shell garage Three vehicles collided causing delays Surrey Fire and Rescue
- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road
Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the offslip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 8789 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel. The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is gridlocked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.
A new onslip at Burpham would only be 1.8km from the onslip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cashflow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2346   Respondent: 15386017 / Gareth Sinnett   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

20. POLICY A43 AND A43a – Garlick’s Arch

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the
pavement often at speed. It has narrow bends with poor sight lines, an infants school and a humpbacked bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and recross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8).

There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic. The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.
This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

POLICY A43 AND A43a – Garlick’s Arch

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5132  Respondent: 15386017 / Gareth Sinnett  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

8. POLICY D3

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5139  Respondent: 15386017 / Gareth Sinnett  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

15. POLICY D3

I OBJECT to Policy D3 Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.
I OBJECT to Policy D4 Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5140  
Respondent: 15386017 / Gareth Sinnett  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

5. POLICY E1

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and
general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a nonsustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/5130 | Respondent: 15386017 / Gareth Sinnett | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E2

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and highquality area of Green Belt. Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/5131  **Respondent:** 15386017 / Gareth Sinnett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

7. **POLICY E5**

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/5142  **Respondent:** 15386017 / Gareth Sinnett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

18. **POLICY E6**

I OBJECT to Policy E6 The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:
1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less offputting and support townbreak packages for highvalue tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

1. To help private providers market local This need not involve extra spending. The Council could, for instance, help coordinate readymade, local tourism packages under a distinctive brand at an allin price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European tourists who currently bypass Guildford to go to Bath, Oxford or Cambridge instead.

2. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5138  Respondent: 15386017 / Gareth Sinnett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

14. POLICY E7

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.
The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull highstreet chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

12. POLICY H1

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on outdated, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, highrise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 45 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and underused surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Overprovision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative nonpremium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative nondevelopment uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to other towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of £360,000 the discounted price is still not going to be affordable to anyone on a normal income. And at what point will ‘affordable homes’ be able to go onto the market at full market price? As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The bluebox policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 8789) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The bluebox policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 8789) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
9. POLICY I1

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion averaging it over periods of several hours and ignoring the effects of junctions simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a precondition of sustainable development. But in this plan it is an afterthought buried away in Policy 11. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development nonviable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services. Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The link road that runs through the village of West Clandon (A247) is currently a 'hazardous' road as highlighted in a traffic survey, and only today there has been yet another accident on this road with the colliding vehicles mounting the pavement. At present, infant school children walking to the small local school are forced to walk along narrow pavements close to a road which is unsuited to the volume and type of traffic that uses it. Last week my wife had to jump across the pavement to avoid being hit by a lorry who drove up onto the pavement to avoid another passing the other way, and had her own car struck by another travelling at speed a few months ago. Large vehicles such as lorries and buses are frequently seen mounting the pavements at significant speeds to avoid collisions with one another and will no doubt in time lead to serious injury or death. A development as proposed in the local plan will significantly increase the likelihood of this occurring, as a direct result of the obvious increase in traffic in the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5135  Respondent: 15386017 / Gareth Sinnett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

11. POLICY I3

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5123  Respondent: 15386017 / Gareth Sinnett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Re: Responses to Guildford Borough Proposed Submission Local Plan (June 2016)

I am writing to express my serious concerns relating to the most destructive policy ever to be imposed on the population of Surrey, or as you call it the 'Guildford Borough Plan'. In addition to my comments below which directly relate to the outlined proposals, I am disappointed and perplexed as to how the council feels to is right to make such ludicrous plans at the significant expense of areas of outstanding natural beauty in the Guildford area.

The plan is a total attack on the beautiful green areas which surround the northeast of Guildford, and it is not only unethical to propose building on Greenbelt land but destructive to a small local village community within this region. Greenbelt land is intended to protect small village settlements, such as West Clandon, from the urban sprawl of larger town and cities, and the residents of such communities live away from urban areas out of choice. As such it is totally unacceptable to be proposing to build on such large green spaces as an urban extension, when it will totally transform the number of residents living within a parish.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1. POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national...
guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” twothirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.
GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5143  Respondent: 15386017 / Gareth Sinnett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

19. SITES POLICIES A1 TO A57

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5128  Respondent: 15386017 / Gareth Sinnett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
4. POLICY P4

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5125  Respondent: 15386017 / Gareth Sinnett  Agent: 0

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Furthermore, the additional information below supports the need to scrap these plans:

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

1. POLICY S1 Sustainable Development

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both planmaking and decisiontaking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious longterm impacts. The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on
economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development. The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by overdevelopment, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5126  Respondent: 15386017 / Gareth Sinnett  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. POLICY S2 Borough Wide Strategy

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on preBrexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” triborough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, halfhour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the triborough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial subcontractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their prodevelopment agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.
It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Proposed Submission Local Plan: strategy and sites 2016</td>
<td>Question 1: The evidence base and submission documents</td>
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### Questions posed by Guildford Borough Council as part of its consultation

Questions from GBC

20.A. Question 1: The evidence base and submission documents

The Proposed Submission Local Plan: strategy and sites is based on up-to-date evidence. The evidence base documents contributing to the preparation of the plan are listed in [Appendix D](#) and can be found on our [website](#) (links open in a new window).

Do you agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant?

**ANSWER**

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local Guildford which is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

2. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures Independent assessments of the SHMA (e.g., from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up-to-date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be reassessed and the methodology for arriving at housing need figures should be fully transparent.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
24.B. Question 2: Legal Compliance

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant? Please provide the following information being as precise as possible:

- why you consider it is or is not legally compliant and
- what change(s) (if any) you consider necessary to make it legally compliant, explaining why this is the

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be reassessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

24.C. Question 3: Soundness

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound? Please provide the following information being as precise as possible:

- why you consider it is or is not sound and
- what change(s) (if any) you consider necessary to make it sound, explaining why this is the

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. "Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green" Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
1. The housing OAN figure has been calculated by a process which is not It has not been properly examined by Councillors before being adopted.

2. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

3. The draft Plan does not accord with the NPPF policies on protecting the Green Belt. Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt siteswhich amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the

2. The housing number is at least twice the achieved rate of building in the Borough over the last few There is no evidence in the Plan to show that this rate is achievable and sustainable.

3. Much of the infrastructure required to support the level of development proposed is outside the Council’s The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

1. The 4045% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development nonviable.

2. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation

3. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation

4. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound

5. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018

6. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars

7. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham

1. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework

2. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation

3. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

4. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens
5. In common with many others I do not believe the housing figure has been properly calculated and I believe it 
overstates housing. The Council has prevented councilors or others from properly considering the SHMA by 
refusing to make public the basis on which it was drawn up.

6. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's 
circumstances, including in particular the Green Belt and road. National policy permits such constraints to be 
applied and it is inappropriate not to consider the need to do this.

7. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on 
a wholesale

8. Cast iron commitment should be included in the plan that development can only commence when required 
infrastructure improvements have been

9. The status of the text which accompanies each policy box is not. If the accompanying text does not have the force 
of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to 
very little.

The draft Plan should be reassessed with housing on brownfield sites made a priority over commercial development and 
Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>SQLP16/875</th>
<th>Respondent:</th>
<th>15386017 / Gareth Sinnett</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate</td>
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| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally 
Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

24.D. Question 4: Duty to cooperate

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to 
cooperate? Please provide the following information being as precise as possible:

• why you consider it has or has not complied with the Duty to cooperate and
• what change(s) (if any) you consider necessary to make it comply with the duty to cooperate, explaining why this 
is the

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to 
cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to cooperate with the wishes 
and requirements of the vast majority of the residents in its Borough. The Council has failed to cooperate with the results of 
the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent 
on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into 
surrounding rural villages.
This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4356   Respondent: 15386017 / Gareth Sinnett   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt.
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity.
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.
11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding...
is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I3). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site
will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4358  Respondent: 15386017 / Gareth Sinnett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word "minimum" is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.
9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.
10. The impact on small surrounding roads will create traffic gridlock.
11. It will join up existing villages and defeat the purpose of the Green Belt.
12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/2781  Respondent: 15386017 / Gareth Sinnett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp17q/623  Respondent: 15386017 / Gareth Sinnett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPA16/1288  Respondent:  15386081 / Gary Wicks  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Shalford (north)

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In the local plan under consideration, the fields behind Shalford Village hall and the tennis courts, have been designated as "OPEN SPACES" and as such- although we can find no full definition of open spaces - we understand are no longer considered for housing.

We the Committee of Shalford Lawn Tennis Club are greatly encouraged by this classification which designates those fields in line with the intention and spirit in which the land was gifted over 5 decades ago for the inhabitants of Shalford and the neighbourhood "for use for meetings,... and other forms of recreation and leisure -time occupations with the object of improving the conditions of life for the said inhabitants".

However, we are deeply concerned and disappointed that Guildford Borough Council have totally ignored the numerous objections from this Club and residents of Shalford and are sticking to their proposed 2014 settlement boundaries to include this land and other openland within the built up area of Shalford. Without the protection of its Green Belt Status this so called "Open Spaces" would invite housing development proposals and may not achieve the Council's intentions for the site. A clear and full explanation of the open space notation would therefore be appreciated.

The Assessment of Open Spaces, Sports and Recreation prepared by ETHOS within in the new local plan "Acknowledges the value of play in NATURAL OUTDOOR spaces towards healthy learning and development" Shalford Lawn tennis club subscribe totally to this ideal. We are a club of over 400 members. Our joining and annual subscription fees are kept at an enviable affordable level. We manage and maintain 3 courts one of which is open to public use. Over one third of our members are juniors for whom coaching is available. In conjunction with local schools we have run free introduction to tennis days to encourage children to participate and keep active in Sport.

All who play, and many who have visited to play, have expressed their pleasure and enjoyment in our natural village surroundings with the pond, football, and cricket pitches below, and the open fields above. Any buildings on these fields, which are 25ft above the village hall and 32ft above the Kings road, would destroy not only the character of the tennis club but the very Green heart of the village itself. Furthermore, the extra traffic exiting on Chinthurst Lane would increase the potential for accidents on a narrow lane and worsen the existing chaotic flow and pollution.
If Guildford Borough Council are genuinely, sincerely and honestly wanting to support the bold statement of the Ethos report then they need to change the boundaries back to the 2003 plan and give these fields the protection they deserve and match the wishes of the original generous donor.

Finally, if the intention is that fields "are to be used for recreation purposes or for potential recreational use" and are protected against housing development then we are keen to explore the possibilities of if and how we could participate as we already see a need for further courts.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/1296  **Respondent:** 15386337 / Edna Slater  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **APPENDIX C**

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/1295  **Respondent:** 15386337 / Edna Slater  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

2. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

3. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1297  Respondent: 15386337 / Edna Slater  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **APPENDIX D**

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.
The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2353  Respondent: 15386337 / Edna Slater  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY A25 - Gosden Hill Farm

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents
2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25 J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.
The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2354  Respondent: 15386337 / Edna Slater  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY A43 AND A43a – Garlick’s Arch

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase.
when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)
The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic. The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5151  Respondent: 15386337 / Edna Slater  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY D3

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5158  Respondent: 15386337 / Edna Slater  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. POLICY D3

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5159  Respondent: 15386337 / Edna Slater  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY D4

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5148  Respondent: 15386337 / Edna Slater  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. **POLICY E1**

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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1. **POLICY E2**

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.
There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **POLICY E5**

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **POLICY E6**

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For
example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/"Disneyfication". Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5157  Respondent: 15386337 / Edna Slater  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E7

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable
residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H1

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.
It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H2

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H3

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY II

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy II)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy II. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable
(and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy II requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY I2

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).
Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5154  Respondent: 15386337 / Edna Slater  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY I3

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5146  Respondent: 15386337 / Edna Slater  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.
This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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1. SITES - POLICIES A1 TO A57

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/5147  **Respondent:** 15386337 / Edna Slater  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

1. **POLICY P4**

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/5144  **Respondent:** 15386337 / Edna Slater  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

Re: Responses to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

1. **POLICY S1**
I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these
adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN Ire not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Questions posed by Guildford Borough Council as part of its consultation.**

24.A. **Question 1: The evidence base and submission documents**

The Proposed Submission Local Plan: strategy and sites is based on up-to-date evidence. The evidence base documents contributing to the preparation of the plan are listed in Appendix D and can be found on our website (links open in a new window).

Do you agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant?

**ANSWER**

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up-to-date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
Answer (if comment is on questions 1-7 of the questionnaire): ()

24.B. Question 2: Legal Compliance

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole is legally compliant? Please provide the following information being as precise as possible:

- why you consider it is or is not legally compliant and
- what change(s) (if any) you consider necessary to make it legally compliant, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>SQLP16/878</th>
<th>Respondent:</th>
<th>15386337 / Edna Slater</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

24.C. Question 3: Soundness

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound? Please provide the following information being as precise as possible:

- why you consider it is or is not sound and
- what change(s) (if any) you consider necessary to make it sound, explaining why this is the case.

ANSWER
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford’s circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and
foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens

11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councillors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/879  Respondent: 15386337 / Edna Slater  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

24.D. Question 4: Duty to cooperate

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate? Please provide the following information being as precise as possible:

- why you consider it has or has not complied with the Duty to cooperate and
- what change(s) (if any) you consider necessary to make it comply with the duty to cooperate, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.
The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1294  Respondent: 15388065 / Emily Hustler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I don’t think that you should build on the green belt because it will be from a village to a town and there will be less humans and living things trees and plants help us live and it’s a nice view but if it’s a town it won’t be once the schools struggle they will struggle and most people could be home school and that’s not good for a future. It will also mean it will be noisy and crowded and we already have been chopping down thousands of trees to survive so we don’t need any more just to have houses. We don’t even know that the houses will be bought they could just sit there and effect us.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2349  Respondent: 15388097 / Simon Dearnley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<thead>
<tr>
<th>Comment ID: pslp172/811</th>
<th>Respondent: 15388097 / Simon Dearnley</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/2350</th>
<th>Respondent: 15388161 / Hannah Dearnley</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26</td>
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Answer (if comment is on questions 1-7 of the questionnaire): ()
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- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the 2016 draft local plan.

In particular I object to Ripley, Send and Clandon being removed from the green belt which I believe is called ‘in-setting’.

The strategic points being proposed for development being Garlick’s Arch which is on the border of Ripley and Send at Burnt Common and also Wisley and Gosden Hill at Clandon.

The plan is to build 14,000 new homes under a revised draft local plan.

This would surely cause havoc.

I also object to the lack of evidence for the provision of new schools, doctor’s surgeries not to mention drainage/sewage facilities and the chaos which would be caused by traffic, in this day and age the norm has become for most homes to have 2 or 3 cars. The mind boggles at the number of cars on the local roads at any one time especially rush hours.

I object to the short amount of notice given to the inhabitants of afore mentioned villages.

It is also proposed to build a new 4 way on/off ramp to the A3 at Burnt Common. How is this supposed to answer the problem caused by hundreds of extra cars vans and trucks passing through and converging on Send/Ripley and Clandon?

Losing the Green Belt would be a huge loss of history and amenities in an attractive and much loved area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

** I object to the proposed Infrastructure Schedule (Appendix C)

There is no schedule for Garlicks Arch (A43); the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
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<tr>
<th>Comment ID: PSLPA16/1299</th>
<th>Respondent: 15388385 / Linda Bagnall</th>
<th>Agent:</th>
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<tr>
<td><strong>Document:</strong>  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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<tr>
<td><strong>I object to the figure of 693 houses per annum in the borough being too high (Appendix D)</strong></td>
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<tr>
<td>GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<tr>
<td><strong>Document:</strong>  Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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<tr>
<td><strong>I object to the inclusion of the land at Garlicks Arch, Send Marsh/Burnt Common and Ripley (A43)</strong></td>
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<td>Garlick’s Arch is Green Belt and has ancient woodland and has a thriving wildlife habitat, which should be protected. There is no infrastructure, it floods and the the Draft Local Plan Infrastructure schedule does not provide for this site at all.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<tr>
<td><strong>Document:</strong>  Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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</table>
** I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

This is disastrous as the increased volume of traffic would impact the local communities. The increased traffic from London (M25) to Woking would go through Burnt Common, Send and Old Woking, which currently cannot cope with the existing traffic. This is unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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** I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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** I object to the employment strategy and impact on Garlicks Arch (A43) (Policies E2 and E5)

The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to the lack of proper infrastructure planning for sites (Policy I1)

The current and existing services are over-stretched now, so where are the infrastructure improvements to support the enormous proposed developments, including medical, public transport, schools?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5172  Respondent: 15388385 / Linda Bagnall  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to the congestion that development will cause to the trunk roads A3/M25 (Policy12)

Both the A3 and M25 need improvements before any developments commence. This is clearly not going to happen in the timescales of the plan, so the proposed developments at Wisley Airfield (A35), Garlicks Arch (A43) and Gosden Hill (A25) should NOT take place.

Please record these objections individually against the relevant sections of the plan and ensure that they are submitted to the Planning Inspectorate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5169  Respondent: 15388385 / Linda Bagnall  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
** I object to poor air quality concerns (Policy 13)

The increased congestion that will arise from the massive proposed developments will in turn lead to increased air pollution which will have damaging effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

** I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

** I object to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

This will cause more congestion to the villages of Ripley, Send and Clandon, which have poor condition narrow roads and no footpaths, which are dangerous. More houses will increase this danger and unsustainable volumes of traffic

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

** I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

** I object to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

This will cause more congestion to the villages of Ripley, Send and Clandon, which have poor condition narrow roads and no footpaths, which are dangerous. More houses will increase this danger and unsustainable volumes of traffic

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
** I object to development in areas at risk of flooding (Policy P4)

The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/5164  Respondent: 15388385 / Linda Bagnall  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the 2016 draft local plan for the following reasons:

** I object to the local plan as the development proposed is not sustainable (Policy S1)

The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/5167  Respondent: 15388385 / Linda Bagnall  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to the Borough Wide Strategy (Policy S2)

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPS16/2359  Respondent: 15388641 / Eva Hay  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  
Answer (if comment is on questions 1-7 of the questionnaire): ()  
- I object to building 45 houses at Clockbarn as it has inadequate access and the junction with Send Road is already dangerous for vehicles exiting onto the main road. Tannery Lane is a ‘lane’ and is totally inadequate to take large quantities of traffic of any kind. It would also make it extremely hazardous for pedestrians or cyclists. There is already planning permission for 64 houses and a marina which will also generate heavy traffic. The road cannot sustain any more traffic.  
What changes (2016)/further amendments (2017) do you suggest should be made to the document?  
Attached documents: 

Comment ID: PSLPS16/2358  Respondent: 15388641 / Eva Hay  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  
Answer (if comment is on questions 1-7 of the questionnaire): ()  
I object to the development at Garlick’s Arch because the site is covered in ancient woodland and is within the Green Belt and should stay that way. 16th century trees would be endangered. This area is also subject to flooding.  
I object to the proposed industrial development of 7,000 sq m at Garlick’s Arch. The latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan so this is not required. Any industrial development needed should be built Slyfield where there is a 40ha site available.  
What changes (2016)/further amendments (2017) do you suggest should be made to the document?  
Attached documents: 

Comment ID: PSLPS16/2357  Respondent: 15388641 / Eva Hay  Agent:  

Page 2524 of 2804
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the proposed new interchange onto the A3 at Burnt Common because it would mean that Send and the (A247) would be completely gridlocked all day.

- I object to the proposed new interchange onto the A3 at Burnt Common because Send would be used as a cut through to the A3/M25 making the local roads hazardous for pedestrians and cyclists. There are hardly any pavements and very few cycle lanes.

- I object to the proposed new interchange onto the A3 at Burnt Common because the huge extra amount of traffic ensuing would compromise the air quality, sound quality and light quality to all residents in Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

- I object to the proposal of development at Send Hill in the local plan on the grounds that both the Envirosearch Report RS1100201_1_1 dated 17th February 2004 identifies ‘potential risk from landfill gas migration’ which is a health hazard. The ground is already being vented.

- I object to the development of 40 houses and 2 Travellers pitches at Send Hill because it is in a most beautiful part of the Green Belt.

- I object to the development of 40 houses and 2 Travellers pitches at Send Hill because access is gained from a very small single track country lane which is totally inappropriate for any traffic larger than the occasional car.

- I object to the development of 40 houses and 2 Travellers pitches at Send Hill because too many houses are proposed in the Send area and the impact on traffic congestion and local services would be unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the fact that the infrastructure requirements for all of the borough have not been investigated properly and are totally inadequate to deal with proposed development levels. Highways, public transport, medical facilities and schools are already at full capacity in this area and will be unable to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5180  Respondent: 15388641 / Eva Hay  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5173  Respondent: 15388641 / Eva Hay  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

Re: Objections to Regulation 19 Draft Guildford Borough Council Local Plan
I wish to object to the above for the following reasons:

- I object to the removal of Send, Ripley and Clandon from the Green Belt because these villages and surrounding countryside provides a necessary ‘buffer’ to prevent urban sprawl.
• I object to the proposed building on the Green Belt at Send at Garlick’s Arch, Clockbarn Nurseries and Send Hill because there are no ‘special circumstances’ to justify this. The Green Belt should not be continually eroded and should stay permanent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5175  Respondent: 15388641 / Eva Hay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

-I object to all proposed building on the Green Belt at Send, Ripley and Clandon as any development needed can be accommodated in Guildford’s urban brownfield areas much closer to existing transport hubs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5177  Respondent: 15388641 / Eva Hay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

-I object to the huge developments planned of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large quantities of agricultural land and Green Belt. “The fundamental aim of the Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belt are their openness and their permanence.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Comment ID: PSLPP16/5174</th>
<th>Respondent: 15388641 / Eva Hay</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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- I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

I wish these objections to be fully considered and taken into account when changing the proposed Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: SQLP16/880</th>
<th>Respondent: 15388641 / Eva Hay</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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- I object to the estimated figure of 13,860 for housing need which is miscalculated and far too high. If this was calculated correctly it would be unnecessary to develop in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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- I object to all the lack of consultation for all the proposed sites in Send. They were not included in the previous consultation in 2014 and all its sites have been changed substantially.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: pslp172/3396  Respondent: 15388641 / Eva Hay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to removal of Brownfield sites (A4) from the Plan

1. Site A4 in Guildford has been removed. This is a perfectly good housing site, within the town centre and therefore with sustainable infrastructure, and would make use of a brownfield site that is in need of redevelopment. The Plan has removed housing from this site, in favour of commercial retail – thereby effectively substituting Green Belt land for retail development, which is totally unacceptable.

2. Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. The Council’s claims to “have adopted a ‘brownfield first’ approach” (page 5) but this is clearly not the case, and is contrary to national guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3393  Respondent: 15388641 / Eva Hay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. There has been an increase in proposed building of houses from 45 to 60 – this is ridiculously too many for our area.
2. This totally ignores hundreds of previous objections by local residents.
3. Access to Tannery Lane at the A247 junction is not viable for the amount of traffic that will be incurred.
4. Tannery Lane itself if not capable of being used by large or numerous vehicles – it is a Lane.
5. This will be eroding even more of the Green Belt.
6. There is already bad surface water flooding in this area. This can only increase the problem.
7. This has been increased by a third since the 2016 version of the Plan. This will have a significant impact on the already highly congested local rural road network around Send. This is in contradiction to section 2.14a of the Plan which states "Whilst most local roads are single carriageway, with a lane in each direction, it is at their junctions that the free flow of traffic is most often impeded during peak periods, in some cases resulting in significant delays." And yet there are no proposals to improve the local roads, only to add more junctions with the A3, thereby increasing congestion on the Trunk and Local road network.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: pslp172/3392  Respondent: 15388641 / Eva Hay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. This totally ignores hundreds of previous objections by local residents.
2. There are no ‘exceptional circumstances’ as required by the National Planning Policy to take this area out of the Green Belt.
3. This will remove ancient woodland which cannot ever be regained.
4. Ripley and Send villages will merge, therefore defeating the purpose of the Green Belt.
5. The number of homes proposed is excessive. Send is a village. This is over-development to the extreme.
6. The area is subject to frequent flooding and is currently a Flood Zone 2 allocation.
7. The excessive traffic that will be generated will totally cause mayhem on the Send and Ripley roads. Already whenever there is a road closure nearby or traffic accident (almost a daily occurrence on the A3/M25) in the vicinity – the main Ripley, Send Marsh and Send roads are ridiculously congested or at a total standstill.
8. There is no proven demand for Travelling Show people sites in this location. This development site is for 400 homes and so is not compliant with the minimum of 500 in as stated in section 4.2.24 of the Plan.
9. Guildford Borough is over 100 square miles. Of the 11350 homes proposed in the Plan, 40.6% (4613) are within 3 miles of Send Marsh, most of them on Green Belt. This is grossly unfair on an already overcrowded part of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3395  Respondent: 15388641 / Eva Hay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Foreword to the plan by Paul Spooner includes on page 5:

“We recognise that significant infrastructure upgrades are required to support existing communities and the planned growth of the borough. The delivery of sites allocated in this plan is contingent upon the provision of new infrastructure, which is a key theme of our Local Plan”.

The lack of any plan for either physical or green infrastructure improvement clearly contradicts this in respect of both A43 Garlick’s Arch and A42 Clockbarn Nursery, Tannery Lane, Send. Development of these sites without the contingent infrastructure would therefore be contrary to the stated aims and themes of the Plan, and should not go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: pslp172/3394  Respondent: 15388641 / Eva Hay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A58, land at Burnt Common, London Road for the following reasons:

1. This was deleted from the 2014 draft plan because of all the objections previously made – therefore why has it been included again?
2. There has been a decline in demand for industrial land since the previous draft plant but the 2016 version uses the word ‘maximum’ a change from ‘minimum’ within it – this does not make sense.
3. There are already empty sites and units at Slyfield and Guildford and therefore no need to build new industrial and warehouse developments in our area. I can only envisage these will end up being empty too.
4. The 2017 Employment Land Need Assessment shows a reduction in demand for industrial land for the whole borough to 3.9 hectares. This policy is a huge allocation of 10 hectares for Send alone. Totally unacceptable.
5. The small roads around this area are already often at gridlock. This can only make the problem worse.
6. The merging of existing villages (which will occur) defeats the purpose of the Green Belt.

I object to the proposal for a Waste Management Facility in Green Belt (A58)

The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned in policy 4.423a and does not allow for full and proper consultation. This is unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The policy says: *Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.*

This means that the developer doesn’t even have to provide any ‘affordable’ homes, but just to make a negotiated payment to the Council. I doubt this is likely to result in the construction of any ‘affordable’ homes.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Respondent: 15388673 / Bruce Stewart</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

1. **APPENDIX C**

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPA16/1304</th>
<th>Respondent: 15388673 / Bruce Stewart</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as ill as being entitled to do this the Council was required to give proper consideration to constraints. The
scarcity of sites outside the Green Belt as well as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1306  Respondent: 15388673 / Bruce Stewart  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

1. APPENDIX D

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant
infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/2361  **Respondent:** 15388673 / Bruce Stewart  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

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1. **POLICY A25 - Gosden Hill Farm**

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 – 2014 from Crashmap data

Clandon Cross Roads Area to Bulls Head - 17 incidents

Bulls Heads Head to Bennett Way - 8 incidents

Bennett Way to Highcotts Lane - 15 incidents

Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays

Surrey Fire and Rescue deployed.
2016

15 April 2016 12 year old boy injured in The Street – A247 closed in both directions

28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham

30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.
The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2362  Respondent: 15388673 / Bruce Stewart  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY A43 AND A43a – Garlick’s Arch

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that
The redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.
The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/5192  **Respondent:** 15388673 / Bruce Stewart  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

1. **POLICY D3**

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/5200  **Respondent:** 15388673 / Bruce Stewart  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

1. **POLICY D3**

I OBJECT to Policy D3 - Historic environment
I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5201  Respondent: 15388673 / Bruce Stewart  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY D4

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5188  Respondent: 15388673 / Bruce Stewart  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E1

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support
development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. POLICY E5

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.
4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the
countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the
existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford
Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which
are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation
of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of
small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in
Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5197  Respondent: 15388673 / Bruce Stewart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H1

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will
encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not
specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not
been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that
developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated
with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would
free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages
than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University,
which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve
the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students
Ire accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s
Back.
It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5198  Respondent: 15388673 / Bruce Stewart  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H2

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5202  Respondent: 15388673 / Bruce Stewart  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3
Do you consider this section of the document; complies with the Duty to Cooperate? (), is Sound? (), is Legally Compliant? ()

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H3

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations Ire available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. POLICY I1

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists pass through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable
(and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID:</th>
<th>PSLPP16/5195</th>
<th>Respondent:</th>
<th>15388673 / Bruce Stewart</th>
<th>Agent:</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2</td>
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1. POLICY I2

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).
Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. POLICY I3

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5186  Respondent: 15388673 / Bruce Stewart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is
the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportinate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

1. POLICY P4

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the
flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5184  Respondent: 15388673 / Bruce Stewart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including...
Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5185  Respondent: 15388673 / Bruce Stewart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The Borough-wide strategy is poorly considered. It proposes 13,860 housing being developed across the Borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For
instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the
local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>SQLP16/881</th>
<th>Respondent:</th>
<th>15388673 / Bruce Stewart</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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1. Questions posed by Guildford Borough Council as part of its consultation.

Questions from GBC

24.A. Question 1: The evidence base and submission documents

The Proposed Submission Local Plan: strategy and sites is based on up-to-date evidence. The evidence base documents contributing to the preparation of the plan are listed in Appendix D and can be found on our website (links open in a new window).

Do you agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant?

ANSWER

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:
1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest 'value creation' areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/882  Respondent: 15388673 / Bruce Stewart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

24.B. Question 2: Legal Compliance

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole is legally compliant? Please provide the following information being as precise as possible:

• why you consider it is or is not legally compliant and
• what change(s) (if any) you consider necessary to make it legally compliant, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire):

24.C. Question 3: Soundness

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound? Please provide the following information being as precise as possible:

- why you consider it is or is not sound and
- what change(s) (if any) you consider necessary to make it sound, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—amounting to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.
10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens
11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.
12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.
14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.
15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**24.D. Question 4: Duty to cooperate**

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate? Please provide the following information being as precise as possible:

- why you consider it has or has not complied with the Duty to cooperate and
- what change(s) (if any) you consider necessary to make it comply with the duty to cooperate, explaining why this is the case.

**ANSWER**

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4422  Respondent: 15388673 / Bruce Stewart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.

6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green belt be intent on conserving it rather than exploiting it.

7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.
18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site.

2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.

3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.

4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”

5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.

6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.

7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2851  Respondent: 15388673 / Bruce Stewart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick's Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/540 Respondent: 15388673 / Bruce Stewart Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1307 Respondent: 15388737 / Elizabeth Sharman Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the disregard Guildford Borough Council and its attitude towards planning regulations and lack of consultation with relative bodies including Parish Councils in Send and Ripley to which they have shown to respect.

I object to the lack of thought and consideration to the local needs such as the over development of housing and industrial use which is far and above what is needed.

I object to the grounds that the roads are not capable of taking the traffic as they already get gridlocked morning and evening the school capacity is not there the Doctors surgery is already oversubscribed it is also already impossible to park in front if the shops etc

I object very strongly to the removal of Send from the Green Belt as this will ruin what is a beautiful area enjoyed and used very much by local people. Also much of the proposal is woodland which should be protected by you.

I object also to the over development of land at Burnt Common. 400 houses and 7000 sq m of industry and warehousing this is unnecessary over development also it is alongside the very busy A3.

I object to the proposed 4 way interchange on the A3 at Burnt Common this would be disastrous for Send and Ripley and would add to the destruction of the area. We have lived in Send for 30 years and realise change will come but what Guildford Borough Council is proposing will ruin instead of enhance the whole area.

I hope you will look seriously at this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2393  Respondent: 15388737 / Elizabeth Sharman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the wholesale destruction of the Green Belt in this area, including the planned development of 2000 homes at Gosden Hill Farm, Merrow (Policy A25) in clear contravention of the central government's stated commitment for Green Belt protection.

I look forward to hearing your response on the issues raised in this letter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Garlick's Arch (Policy A43) proposal to build 400 houses and 7000 m2 of light/ general industrial/storage distribution space on the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1309  Respondent: 15388865 / Andrew Powell-Cullingford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

10. I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements of the Local Plan in order to comply with the Statutory Regulation. There is no schedule for Garlick’s Arch (site A43), so the Plan takes no account of the infrastructure required for this site. I maintain that this infrastructure schedule is not fit for purpose and I therefore object to this Plan as being inherently unsound.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1824  Respondent: 15388865 / Andrew Powell-Cullingford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the proposed Infrastructure Schedule

The Infrastructure Schedule sets out the key infrastructure requirements of the Local Plan in order to comply with the Statutory Regulation. There is no schedule for Garlick's Arch (site A43), so the Plan takes no account of the infrastructure required for this site. I maintain that this infrastructure schedule is not fit for purpose and I therefore object to this Plan as being inherently unsound.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1308  Respondent: 15388865 / Andrew Powell-Cullingford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

9. I object to the lack of transparency in establishing the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough (Appendix D)

The Plan’s proposed growth is based on the SHMA report, which states that 693 homes per annum are required by the borough, which is more than double the figure of 322 used in previous plans.

However as the Council will not publish the SHMA report, this figure cannot be verified. I object to this lack of transparency and factual confirmation of this key issue for consultation on the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1823  Respondent: 15388865 / Andrew Powell-Cullingford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the lack of transparency in establishing the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough (Appendix D)

The Plan's proposed growth is based on the SHMA report, which states that 693 homes per annum are required by the borough, which is more than double the figure of 322 used in previous plans.
However as the Council will not publish the SHMA report, this figure cannot be verified. I object to this lack of transparency and factual confirmation of this key issue for consultation on the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2364  Respondent: 15388865 / Andrew Powell-Cullingford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

6. I object to the late substitution and inclusion of the land at Garlick's Arch, Send Marsh/Burnt Common and Ripley (site A43)

Garlick's Arch should be protected from development as previously undeveloped Green Belt. This site is over 100 acres of grade 2 agricultural land surrounded by designated ancient woodland and traversed by a stream flowing into the River Wey. There are no exceptional circumstances which allow for the removal from the Green Belt (Policy P2). Central Government state clearly that housing need is not an exceptional circumstance.

The Local Plan states their preference is for the use of previously developed land, but GBC have removed a current industrial brownfield site at Burnt Common and replaced it with Garlick's Arch. This late substitution on 11th May 2016 with no prior consultation with the local community is in direct contravention of NPPF. In addition, I object to the allocation of the same policy site number A43 for both sites is the removed site A43 “the land at Burnt Common” and the substituted site A43 Garlick’s Arch. This is not acceptable and suggests a degree of duplicity by GBC and not being fully open and transparent in this substitution.

One wonders also if the “gifting” of the land and financial provision for the construction of the A43a ramps at a suggested cost of £20million paid for by the owner/developer of Garlick's Arch (all of which has been publicly confirmed by Cllr Paul Spooner and Cllr Matt Furniss and recommended by them both as a good thing) is one of the key factors in the decision to substitute in Garlick's Arch as site A43? It appears that this site is being heavily promoted by GBC as an enabling facility for site A25 Gosden Hill. This is completely unacceptable and I object in the strongest terms.

The sites A43 and A43a are not appropriate because:

- There is no sustainable transport infrastructure.
- The site is liable to frequent flooding
- The site has Ancient woodland and is a wildlife habitat, but no wildlife report for the site is in the Plan. There is substantial anecdotal evidence from local residents of the existence of significant numbers of wildlife at Garlicks Arch who utilise this land as a wildlife corridor in between Send and Ripley. There are bats, owls, deer, badgers, red kites, and many other species of flora and fauna.
- There are no plans to improve local schools, medical facilities or utilities to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3582  Respondent: 15388865 / Andrew Powell-Cullingford  Agent:
1. I object to the late substitution and inclusion of the land at Garlick's Arch, Send Marsh/Burnt Common and Ripley (site A43)

Garlick's Arch should be protected from development as previously undeveloped Green Belt. This site is over 100 acres of grade 2 agricultural land surrounded by designated ancient woodland and traversed by a stream flowing into the River Wey. There are no exceptional circumstances which allow for the removal from the Green Belt (Policy P2). Central Government state clearly that housing need is **an** exceptional circumstance.

The Local Plan states their preference is for the use of previously developed land, but GBC have removed a current industrial brownfield site at Burnt Common and replaced it with Garlick's Arch. This late substitution on 5th May 2016 with no prior consultation with the local community is in direct contravention of NPPF. In addition, I object to the allocationofthesamepoliciesitenumberA43forbothsitesiteA43 "the land at Burnt Common" and the substituted site A43 Garlick's Arch. This is not acceptable and suggests a degree of duplicity by GBC and not being fully open and transparent in this substitution.

One wonders also if the "gifting" of the land and financial provision for the construction of the A43a ramps at a suggested cost of £20million paid for by the owner/developer of Garlicks Arch (all of which has been publicly confined by Cllr Paul Spooner and Cllr Matt Furniss and recommended by them both as a good thing) is one of the key factors in the decision to substitute in Garlick's Arch as site A43? It appears that this site is being heavily promoted by GBC as an enabling facility for site A25 Gosden Hill. This is completely unacceptable and I object in the strongest terms.

The sites A43 and A43a are not appropriate because:

- There is no sustainable transport infrastructure.
- The site is liable to frequent flooding.
- The site has Ancient woodland and is a wildlife habitat, but no wildlife report for the site is in the Plan. There is substantial anecdotal evidence from local residents of the existence of significant numbers of wildlife at Garlicks Arch who utilise this land as a wildlife corridor in between Send and Ripley. There are bats, owls, deer, badgers, red kites, and many other species of flora and fauna.
- There are no plans to improve local schools, medical facilities or utilities to cope.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
1. I object to the employment strategy and impact at Garlick’s Arch (A43) (Policies E2 and E5)

There is no requirement for a new industrial site at Garlick’s Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7000 sq m proposed, That site was removed from the Plan without any reasoned argument or consultation.

Furthermore the development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been on site for many decades employing local people and are therefore clearly sustainable. These businesses do not wish to relocate to new premises.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/2363</th>
<th>Respondent: 15388865 / Andrew Powell-Cullingford</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

5. I object to the inclusion of the land for new on/off ramps at Burnt Common (site A43a)

I object to the two new on and off ramps from the A3 at Burnt Common and the possibility of ASP3 to formulate a four way on-off system in order to enable access to and from the A3 for site A25 Gosden Hill. There will be an enormous impact upon both Ripley, Send Marsh/Burnt Common and Send as this new ramp system will draw in a huge amount of through traffic from surrounding areas including Woking and the outer reaches of Guildford Borough via Clandon and Horsleys.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5210  Respondent: 15388865 / Andrew Powell-Cullingford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

8. I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

The Garlick's Arch (A43) proposal would significantly increase the volume of housing in the locality. In addition it would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees with tree preservation orders.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7946  Respondent: 15388865 / Andrew Powell-Cullingford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the damage to the historic environment as a result of the scale of the proposed development (Policy 03)

The Garlick's Arch (A43) proposal would significantly increase the volume of housing in the locality. In addition it would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees with tree preservation orders.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
12. I object to the employment strategy and impact at Garlick’s Arch (A43) (Policies E2 and E5)

There is no requirement for a new industrial site at Garlick’s Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000 sq m proposed. That site was removed from the Plan without any reasoned argument or consultation.

Furthermore the development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been on site for many decades employing local people and are therefore clearly sustainable. These businesses do not wish to relocate to new premises.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

3. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

There is no actual confirmed provision for any major road infrastructure to improve the current congestion, let alone cope with an additional 10000 car movements on the local roads around Ripley as a result of sites A43, A25 and A35 which are an allocation of nearly 4500 homes along a short stretch of the A3. It is extremely unlikely that many journeys will be anything other than by car given the location of these 3 sites. The A3 is already at capacity according to Highways England and they have no intention of even looking at this section of the A3 until at least 2020, with an earliest estimate of any further works unlikely until at least 2027. The local road network is made up of a significant proportion of narrow, poorly maintained, unlit country lanes with no possibility of mitigation. In addition, these lanes are frequently flooded after heavy
rainfall and suffer from significant water runoff from surrounding agricultural land. This traffic congestion is clearly already a significant problem for the current residents of Ripley, Send, Horsleys and Clandon who cannot be expected to endure further traffic chaos with the suggested locations of these huge new sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5213  Respondent: 15388865 / Andrew Powell-Cullingford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

13. I object to the lack of proper infrastructure planning for sites (Policy I1)

The Plan does not identify adequate infrastructure improvements to support the huge scale of development, especially at Garlick’s Arch (A43) which has no infrastructure projects in the Infrastructure Schedule to support it. Local services, utilities and sewerage, medical facilities etc. are at or close to capacity in this area of the borough and will not therefore be capable of coping with such high numbers of additional housing and industrial employment space.

There are no plans to improve or make provision to increase the capacity of the medical and police/emergency services to cover the 5000+ houses in the north east of the borough.

The site at Garlick’s Arch is also traversed by high voltage electricity pylons with no provision for either removal, burial or re-siting and it is unclear as to who will meet the substantial costs involved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7886  Respondent: 15388865 / Andrew Powell-Cullingford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure.

There is no actual confirmed provision for any major road infrastructure to improve the current congestion, let alone cope with an additional 10000 car movements on the local roads around Ripley as a result of sites A43, A25 and A35 which are an allocation of nearly 4500 homes along a short stretch of the A3. It is extremely unlikely that many journeys will be anything other than by car given the location of these sites. The A3 is already at capacity according to Highways England and they have no intention of even looking at this section of the A3 until at least 2020, with an earliest estimate of any further works unlikely until at least 2027. The local road network is made up of a significant proportion of narrow, poorly maintained, unlit country lanes with no possibility of mitigation. In addition, these lanes are frequently flooded after heavy rainfall and suffer from significant water runoff from surrounding agricultural land. This traffic congestion is clearly already a significant problem for the current residents of Ripley, Send, Horsley and Clandon who cannot be expected to endure further traffic chaos with the suggested locations of these huge new sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7965  Respondent: 15388865 / Andrew Powell-Cullingford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of proper infrastructure planning for sites.

The Plan does not identify adequate infrastructure improvements to support the huge scale of development. especially at Garlick's Arch (A43) which has no infrastructure projects in the Infrastructure Schedule 10 support it. Local services, utilities and sewerage, medical facilities etc. are at or close to capacity in this area of the borough and will not therefore be capable of coping with such high numbers of additional housing and industrial employment space.

There are no plans to improve or make provision to increase the capacity of the medical and police/emergency services to cover the 5000+ houses in the north east of the borough.

The site at Garlick's Arch is also traversed by high voltage electricity pylons with no provision for either removal, burial or re-siting and it is unclear as to who will meet the substantial costs involved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5211  Respondent: 15388865 / Andrew Powell-Cullingford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Page 2574 of 2804
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

11. I object to poor air quality concerns (Policy I3)

The huge developments being proposed, particularly in the north east of the borough will lead to considerable further congestion and to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7952  Respondent: 15388865 / Andrew Powell-Cullingford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to poor air quality concerns

The huge developments being proposed, particularly in the north east of the borough will lead to considerable further congestion and to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5206  Respondent: 15388865 / Andrew Powell-Cullingford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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2. I object to all development in the Green Belt and AONB (Policy P2)

I object to the 4 strategic sites on previously undeveloped land of A43 Garlick’s Arch, A25 Gosden Hill, A35 Wisley Airfield and A26 Blackwell Farm as this directly contravenes the protection of Greenbelt land and none of these sites demonstrate the exceptional circumstances required in the NPPF to even consider any encroachment on Greenbelt. I also object to all other developments listed in the local plan which are in the Greenbelt on previously undeveloped sites.

I also object to all insetting of ALL villages in this local plan. In particular I object to the insetting of Ripley and Send Marsh/Burnt Common and Send as this will inevitably lead to coalescence. These villages and communities have their own distinct identities as a result of gradual growth over many centuries. We are not urban areas but rural villages with vibrant communities. Nothing has demonstrated this more than the huge response by members of all these areas who have come together very rapidly to fight this local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7853  Respondent: 15388865 / Andrew Powell-Cullingford  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to all development in the Green Belt and AONB

I object to the 4 strategic sites on previously undeveloped land of A43 Garlick’s Arch, A25 Gosden Hill. A35 Wisley Airfield and A26 Blackwell Farm as this directly contravenes the protection of Greenbelt land and none of these sites demonstrate the exceptional circumstances required in the NPPF to even consider any encroachment on Greenbelt. I also object to all other developments listed in the local plan which are in the Greenbelt on previously undeveloped sites.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5208  Respondent: 15388865 / Andrew Powell-Cullingford  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
4. I object to development in areas which are at risk of flooding (Policy P4)

The Plan does not take adequate account of flood risk as required by National Planning Policy.

The site at Garlick’s Arch (sites A43 and A43a) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment i.e. the site is classified as flood zone 3 due to the presence of the stream flowing into the River Wey and being heavy clay soil. There is strong anecdotal evidence by long standing local residents that these fields have flooded many times in recent years in both winter and spring. I object therefore to the local plan being incorrect in its assessment of sites A43 and A43a in respect of flood risk.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7900  Respondent: 15388865 / Andrew Powell-Cullingford  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4. I object to development in areas which are at risk of flooding.

The Plan does not take adequate account of flood risk as required by National Planning Policy.

The site at Garlicks Arch (sites A43 and A43a) is classified by the environment Agency as being in a higher risk than the Council’s own assessment i.e. the site is classified as flood zone 3 due to the presence of the stream flowing into the River Wey and being heavy clay soil. There is strong anecdotal evidence by long standing local residents that these fields have flooded many times in recent years in both winter and spring. I object therefore to the local plan being incorrect in its assessment of sites A43 and A43a in respect of flood risk.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5205  Respondent: 15388865 / Andrew Powell-Cullingford  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the revised Local Plan 2016 as being unsound and not fit for purpose for the reasons listed below:

1. I object to the Local Plan as the volume of development proposed is not sustainable (Policy S1)

I object to the overall provision of nearly 14,000 homes over a period of 15 years. The annual figure of 693 homes is too high and makes no reference to the constraints that can be applied to the OAN in respect of the fact that 89% of the Borough is in the GreenBelt. A figure of approximately 200 homes per annum would be far more achievable and sustainable without the need to build on Greenbelt land and instead to utilise brown field sites in more established urban areas with good public transport links.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7846  Respondent: 15388865 / Andrew Powell-Cullingford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the overall provision of nearly 14,000 homes over a period of 15 years. The annual figure of 693 homes is too high and makes no reference to the constraints that can be applied to the OAN in respect of the fact that 89% of the Borough is in the GreenBelt. A figure of approximately 200 homes per annum would be far more achievable and sustainable without the need to build on Greenbelt land and instead to utilise brown field sites in more established urban areas with good public transport links.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5209  Respondent: 15388865 / Andrew Powell-Cullingford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Answer (if comment is on questions 1-7 of the questionnaire): ()

7. I object to the Borough Wide Strategy (Policy S2)

I object to GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure. This differs from all the other Borough Councils in Surrey, all of whom are utilising the constraints available to significantly reduce their housing per annum figure. Guildford Borough consists of 89% of Greenbelt land and as such, is entitled to apply significant reduction to its housing allocation. The annual figure of 693 homes is unsustainable without significant and detrimental affect on the current residents of the borough.

The Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area within a 4 mile radius and creating a ribbon effect of 5000 homes in new developments along a short stretch of the A3 from J10 M25 to Burpham. I object to the urbanisation and coalescence of this area of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the Borough Wide Strategy

I object to GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure. This differs from all the other Borough Councils in Surrey, all of whom are utilising the constraints available to significantly reduce their housing per annum figure. Guildford Borough consists of 89% of Greenbelt land and as such, is entitled to apply significant reduction to its housing allocation. The annual figure of 693 homes is unsustainable without significant and detrimental affect on the current residents of the borough.

The plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area within a 4 mile radius and creating a ribbon effect of 5000 homes in new developments along a short stretch of the A3 from J10 M25 to Burpham. I object to the urbanisation and coalescence of this area of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

I also object to the enormous cost of both the 2014 Local Plan and the additional expenditure required to draft this 2016 revised version. Certainly the 2016 revised version is no better than the original and in some cases, is significantly worse for many residents. In addition, many residents have spent significant sums of money in establishing various action groups within their local communities, mainly to alert their fellow neighbours and residents about the enormous changes that will go ahead unchecked if we do not collectively oppose the local plan. How can this possibly be a democratic process when GBC have fundamentally failed in their duty to fully consult the residents of the borough?

I object to the GBC aspirations to grow Guildford into a substantially more urban sprawl environment with no regard for the beautiful landscape and historical environment so cherished by people far and wide.

I wish these objections to be fully taken into consideration and that the Plan is amended accordingly as it is not representative of how the majority of residents in the Borough wish to see their community develop over the next 15 years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/885  Respondent: 15388865 / Andrew Powell-Cullingford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1312  Respondent: 15389025 / Keith Cogan  Agent:
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<td>I object to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and again produce congestion on the A3 and surrounding roads including Send. The local infrastructure is completely inadequate to deal with the proposed housing levels. These are massive areas of lovely countryside and protected Green Belt that is just being turned into urban areas. Roads, doctors and schools will be unable to cope.</td>
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Clockbarn A42

I objected to the previous proposal to the marina development on Tannery Lane for reasons of traffic etc and the suspicion that further development proposals would follow. More houses here will exacerbate the problem further and I object again to this additional 45 houses at Clockbarn because of inadequate access and traffic volume. Tannery Lane is far too narrow and bendy to take any more traffic. The junction with Send Road is already very hazardous for vehicles emerging into the main road. Planning permission has already been given for 64 houses at the Tannery and the marina will generate heavy traffic too. The road cannot take any more.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2368  Respondent: 15389025 / Keith Cogan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Garlick’s Arch A43 and A43a

As previously stated I believe the A247 through old woking cannot cope with current levels of traffic never mind more. I object to the development at Garlick’s Arch for 400 houses because it was sprung on the village at the last moment with only 2 weeks’ notice and without any prior consultation and is not required in terms of housing need either for the village or the borough. I don’t believe more houses are required here in a green belt area. I object to the proposed industrial development of 7,000 sq m at Garlick’s Arch because it is simply not required since the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan. If there is a need for 7,000 sq m of industrial space it should be at Slyfield where there is a 40ha site available. I object to the development at Garlick’s Arch because the site has a particular conservation sensitivity since it is covered in ancient woodland. Trees which existed in the 16th century would be endangered. The site is also subject to flooding!

I have objected to many of these proposals before. I hope the council are listening this time and we don’t have to do this all over again. I object in the strongest possible terms to these proposals which destroy our green belt and urge the council to redevelop within urban areas and brownfield sites. I know these are less attractive to developers but so be it. We owe it to our children and future generations to protect our countryside and honour the trust that has been placed in us to do that.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2365  Respondent: 15389025 / Keith Cogan  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed new interchange onto the A3 at Burnt Common. I cant seen any reliable evidence that local transport and roads can accommodate the increase in traffic. While the roads immediately adjacent to the interchange may appear to have some capacity the route through Send over the River Wey and into Old Woking (A247) does not! This road is already heavily congested and would be considerably worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2366  Respondent: 15389025 / Keith Cogan  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
40 Houses at Send Hill A44

I object to the development of 40 houses at Send Hill due to its high quality Green Belt amenity within an area of beautiful countryside which would be spoilt. I frequently walk my dog through this area and the open land is even more appreciated and ‘special’ since the adjacent farmer’s lands have been sold off as private plots and fenced to stop people walking there. Another ‘lost’ section of open countryside. I also object because I understand the subsoil of the existing site contains documented unsafe land fill waste which is currently vented. The proposal to include 2 Travellers Pitches is completely inappropriate due to the narrow width single track country road providing insufficient access to the site. This lane is already dangerous and in particular the junction with Potters Lane where I live is extremely dangerous.

I object to the proposal in the local plan on the grounds that the site is not large enough for the proposed use. It would severely impact on street parking making the road even more dangerous. And again I object on the grounds that Send is in green belt. The proposed inset is inappropriate due to its permanent green belt status and I object in the strongest possible way to this erosion of greenbelt. I also object to the proposal in the local plan on the grounds that it would impact the nature reserve nearby. I have personally observed and enjoyed walking through this area, the wildlife including many butterflies, birds including lapwings that nest on the adjacent field every year. The proposed site is a quality green belt amenity area within countryside and would be spoilt by development. I am also concerned that I believe this area has been used as a landfill site – not as a quarry as seems to be suggested. I am also concerned about increasing run off, erosion (already visible along the roads) and flooding in the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### Comment ID: PSLPP16/5218  Respondent: 15389025 / Keith Cogan  Agent:

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I object to the large proposed development at 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and again produce congestion on the A3 and surrounding roads including Send. The local infrastructure is completely inadequate to deal with the proposed housing levels. These are massive areas of lovely countryside and protected Green Belt that is just being turned into urban areas. Roads, doctors and schools will be unable to cope. I also object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will have a massive impact on the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which as I have already mentioned is already well above full capacity. The A3 is already massively gridlocked both northbound onto the M25 and southbound as it passes Guildford!

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

### Comment ID: PSLPP16/5217  Respondent: 15389025 / Keith Cogan  Agent:

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I write to object very strongly to the proposal to remove Send from the Green Belt and to the developments proposed at Send Hill (A44), (A42) Clockbarn Nurseries and (A43) Garlick’s Arch and also (A35) 2,000 houses at Wisley Airfield, (A25) 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm. Also A36-A39 which transform the village of Horsley.

I work in Woking and shop in Guildford where my children went to school. I have lived in this area for 16 years and it is clear that Send village, the surrounding countryside and the green belt protection provides a crucial buffer between Woking and Guildford. The green belt has provided the protection needed for many years and I cannot seen any justifiable reason for removing it now when it would appear more necessary than ever. As a Fellow of the Institutions of Civil and Structural Engineers and Member of the Institute of Highways and Transportation I have attended many discussions with developers assessing sites for development and the lure of bigger profits building on greenfield sites in preference to more expensive brownfield sites makes this kind of protection absolutely essential both preserving the countryside and nature and also encouraging investment back into our cities and towns. I strongly believe that sufficient brownfield sites are available, closer to transport hubs and that would benefit from developments of this type bringing life back into the town centres.

I don’t think the Guildford Borough Council have demonstrated sufficient investigation of brownfield sites within urban areas which should be targeted first for development before the open countryside and the Green Belt.
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I object to the building on the Green Belt at Send at Garlick’s Arch, Clockbarn Nurseries and Send Hill, I cannot see any justification or special circumstances for eroding the Green Belt in these locations. I don’t understand and object to the aggregated “housing need” figures quoted which appear far too high. In my view these figures are incorrect and should be challenged before considering developments on our green belt that are not wanted and potentially completely unnecessary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
These proposed developments completely destroy the green belt barrier separating Guildford from Burnt Common, Ripley and several other villages in the area!! I am astonished that such a proposal could be considered. These are huge areas of development that would completely destroy the countryside and change the nature of the surrounding villages, wildlife passing through etc. Almost completely removing this band of green belt entirely!! Green belt was brought in to protect our countryside and I object very strongly to these proposals. Please think again. I live on Potters Lane, I love the mix of village and countryside that characterise this area and these proposals would completely change the nature of the village, neighbouring countryside and opportunities for wildlife to survive. Surely we owe something to future generations to stop building over the countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16756  Respondent: 15389025 / Keith Cogan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I also object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will have a massive impact on the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which as I have already mentioned is already well above full capacity. The A3 is already massively gridlocked both northbound onto the M25 and southbound as it passes Guildford!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3139  Respondent: 15389025 / Keith Cogan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A42 Clockbarn Nursery, Tannery Lane

- This is an increase in the scale of development not reduction
- Traffic problems will be worse
- More green belt erosion, against the stunning river way
- Is this not a flood zone?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
A43 Land at Garlick’s Arch 400 homes & traveller sites! Where is the evidence for this requirement, this is massive over-
development and in green belt. Why are we not protecting the greenbelt and the area. This completely contravenes the very
idea and intent of green belt to stop is joining up villages, along with the others it will destroy the essence of these villages..

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

A58 Land at Bunt Common – 7000sq.m of industrial bldg.

• Previously deleted in response to objections the proposal is now unlimited with a MIN 7000sqm!?
• The location is unsuitable, where is evidence of local demand for these units?
• This completely contravenes the very idea and intent of green belt to stop is joining up villages, along with the others it will destroy the essence of these villages..

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

You have removed areas from green belt when surely green belt is specifically to protect countryside and the proposals mean send and ripley are joined and will no longer be two separate villages. you propose extending industrial areas that should never have been located there in the first place, requiring people to drive to work in these locations remote from built up areas where people live requiring jobs. It makes no sense to me.

Policy 2 para 4.3.15 send business park taken out of the green belt altogether!

- Again I object for the same reasons given elsewhere.
- Encouraging development and building over green belt in these locations is a dreadful idea
- Why encourage business parks in the middle of the countryside?

These proposals are worse to those I objected to previously, I can see no improvement only more and more building in the countryside with complete disregard for the wishes of the people that live there and the fact this land is protected as green belt – for very good reason.

- These proposals ignore previous objections, there is no improvement but rather the opposite.
- The scale of the developments has increased not reduced
- Traffic problems will be worse on roads that are not suited and at a time when surely we finally realise we should be removing the need for cars. Surely you should be developing brownfield sites and protecting the green belt?!
- Villages start to disappear as they are conjoined with development, its tragic that the nature of our green belt is being built over in this way.
- These proposals are inappropriate, they don’t suit or support the requirements of the communities that live here and
- Fail to protect this land for nature / wildlife and future generations

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1318  Respondent: 15389089 / R.A. Norfolk  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/2370  Respondent: 15389089 / R.A. Norfolk  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to new sites (Garlicks Arch) being introduced as an after thought when it was not even considered in the previous plan. A slip road on the A3 at Burnt Common has been added to the Draft Local Plan without Highways England consent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5228  Respondent: 15389089 / R.A. Norfolk  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5230  Respondent: 15389089 / R.A. Norfolk  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/5229  Respondent: 15389089 / R.A. Norfolk  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Comment ID: PSLPP16/5232  Respondent: 15389089 / R.A. Norfolk  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

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Attached documents:

Comment ID: PSLPA16/1321  Respondent: 15389121 / M.C. Hollister  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Attached documents:

Comment ID: PSLPS16/2378  Respondent: 15389185 / M. Patrick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5254  Respondent: 15389185 / M. Patrick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5257  Respondent: 15389185 / M. Patrick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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Attached documents:

Comment ID: PSLPP16/5255  Respondent: 15389185 / M. Patrick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

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Comment ID: PSLPP16/5256  Respondent: 15389185 / M. Patrick  Agent:

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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

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**Attached documents:**

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Attached documents:

Comment ID: PSLPA16/1326  Respondent: 15389249 / Michael Dixey  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2381  Respondent: 15389249 / Michael Dixey  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Attached documents:

Comment ID: PSLPP16/5267  Respondent: 15389249 / Michael Dixey  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5271  Respondent: 15389249 / Michael Dixey  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5269  Respondent: 15389249 / Michael Dixey  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

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Attached documents:

### Comment ID: PSLPA16/1327  Respondent: 15389281 / Anthony Smith  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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### Comment ID: PSLPS16/2382  Respondent: 15389281 / Anthony Smith  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

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### Comment ID: PSLPP16/5283  Respondent: 15389281 / Anthony Smith  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
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Attached documents:

Comment ID: PSLPA16/1331  Respondent: 15389345 / Peter Reynolds  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Attached documents:

Comment ID: PSLPS16/2385  Respondent: 15389345 / Peter Reynolds  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

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Attached documents:

Comment ID: PSLPP16/5290  Respondent: 15389345 / Peter Reynolds  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
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Comment ID: PSLPP16/5292  Respondent: 15389345 / Peter Reynolds  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5291  Respondent: 15389345 / Peter Reynolds  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners’ views, or the costs involved in improving the infrastructure, currently out side their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.
I object to the 2016 Draft Local Plan as it has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPS16/2386</th>
<th>Respondent: 15389409 / David Votier</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Airfield in the proposed Local Plan. Although I do not live in the borough the airfield is sufficiently close to my home to present substantial problems to my area if any development of the airfield such as that proposed were to go ahead.

Apart from being in the protected Green Belt, and part of it being a SSSI, the previously-proposed development of this site was comprehensively rejected by your Planning Committee on substantial and compelling grounds of which you are surely aware. The site is surrounded by small and historic villages, the character of which will be fundamentally and unacceptably changed by any development. The possibility of over 2000 new dwellings on the site, some of which would be of the multi-storey variety, together with perhaps an additional 3-4000 cars, would totally ruin the area. Apart from the A3 and M25 roads, which are constantly jammed at peak periods, none of the roads adjacent Wisley Airfield is able to take more traffic than at present. They are all narrow, twisting and without pavements. The additional traffic would represent a nightmare.

Furthermore, even if the additional traffic managed to get to any of the neighbouring stations, e.g. Horsley, Effingham, Cobham, the trains could not cope.

The local shops also could not cope. It is fanciful to suggest that shops and other amenities would be available at the site from the outset. No developer would provide such things until after a substantial number of dwellings had been built.

The area surrounding the site is a beautiful part of the county and well recognised as such. So long as Wisley Airfield remains in the Local Plan, thus signalling to developers that they should keep trying, it will be a blight on us all.

I therefore object in the strongest possible terms to the proposed Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID: PSLPS16/2387</th>
<th>Respondent: 15389441 / P Votier</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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The area surrounding the site is a beautiful part of the county and well recognised as such. So long as Wisley Airfield remains in the Local Plan, thus signalling to developers that they should keep trying, it will be a blight on us all.

I therefore object in the strongest possible terms to the proposed Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5293  Respondent: 15389537 / S Slocombe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO THE REMOVAL OF CHILWORTH FROM THE GREEN BELT.

I FIND IT DIFFICULT TO UNDERSTAND WHY THE VILLAGE OF CHILWORTH IS TO BE REMOVED FROM THE GREEN BELT, WHEN OTHER VILLAGES IN THE TILLINGBOURNE VALLEY, I.E ALBURY, SHERE, GOMSHALL AND ABINGER ARE NOT TO BE REMOVED.
IN THE ST. MARTHA PARISH OF CHILWORTH MOST OF THE LAND IS IN AN AREA OF OUTSTANDING NATURAL BEAUTY. IS IT ALSO INTENDED TO TAKE THIS OUT OF THE GREEN BELT?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPA16/1339</th>
<th>Respondent: 15389697 / Oliver Stewart</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **APPENDIX C**

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPA16/1338</th>
<th>Respondent: 15389697 / Oliver Stewart</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

2. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as well as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as well as infrastructure (most notable roads)
considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard my objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

3. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1340  Respondent: 15389697 / Oliver Stewart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. APPENDIX D

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant
infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID:</th>
<th>PSLPS16/2398</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A25</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **POLICY A25 - Gosden Hill Farm**

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  
  Surrey Fire and Rescue deployed.

2016
• 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
• 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
• 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.
If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2399  Respondent: 15389697 / Oliver Stewart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY A43 AND A43a – Garlick’s Arch

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)
The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.
This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/5308  **Respondent:** 15389697 / Oliver Stewart  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**8. POLICY D3**

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/5318  **Respondent:** 15389697 / Oliver Stewart  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **POLICY D3**

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
Comment ID: PSLPP16/5319  Respondent: 15389697 / Oliver Stewart  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY D4

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5305  Respondent: 15389697 / Oliver Stewart  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E1

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and
general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5306  Respondent: 15389697 / Oliver Stewart  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E2

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. **POLICY E5**

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1. **POLICY E6**

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognise that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is
likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the Borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5317  Respondent: 15389697 / Oliver Stewart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E7

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes
could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/5315</th>
<th>Respondent: 15389697 / Oliver Stewart</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H1

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students are accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.
It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5316  Respondent: 15389697 / Oliver Stewart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H2

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5320  Respondent: 15389697 / Oliver Stewart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H3

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY I1

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritising greenfield over urban, brownfield regeneration, the plan creates insurmountable
(and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the Borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognising this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5310  Respondent: 15389697 / Oliver Stewart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY I2

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).
Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 and M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5297  Respondent: 15389697 / Oliver Stewart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that the infrastructure has not been properly assessed and is inadequate to deal with current housing levels, with such a large increase in housing the roads will not be able to accommodate the huge increase in traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5311  Respondent: 15389697 / Oliver Stewart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY I3

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5298  Respondent: 15389697 / Oliver Stewart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to building on the Green Belt because the essential characteristic of Green Belt is its openness and permanence (National Planning Policy Framework paragraph 79).

I set out below my objections to specific policies and matters within the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5303  Respondent: 15389697 / Oliver Stewart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.
Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so-called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.
GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5322  Respondent: 15389697 / Oliver Stewart  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. SITES - POLICIES A1 TO A57

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5304  Respondent: 15389697 / Oliver Stewart  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
4. POLICY P4

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1. POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognise that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of...
sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5302  Respondent: 15389697 / Oliver Stewart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)
The borough wide strategy is poorly considered. It proposes 13,860 homes being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN are not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would...
remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighbouring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/903  Respondent: 15389697 / Oliver Stewart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. Questions posed by Guildford Borough Council as part of its consultation.

Questions from GBC

24.A. Question 1: The evidence base and submission documents

The Proposed Submission Local Plan: strategy and sites is based on up-to-date evidence. The evidence base documents contributing to the preparation of the plan are listed in Appendix D and can be found on our website (links open in a new window).

Do you agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant?

**ANSWER**

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
24.B. Question 2: Legal Compliance

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole is legally compliant? Please provide the following information being as precise as possible:

- why you consider it is or is not legally compliant and
- what change(s) (if any) you consider necessary to make it legally compliant, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

24.C. Question 3: Soundness

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound? Please provide the following information being as precise as possible:

- why you consider it is or is not sound and
- what change(s) (if any) you consider necessary to make it sound, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:
1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.

3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford’s circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

   Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.

2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

5. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation.

6. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation.

7. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound.

8. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018.

9. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars.

10. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham.

11. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework.

12. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.

13. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

14. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.
15. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

16. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

17. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

18. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

19. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** SQLP16/906  **Respondent:** 15389697 / Oliver Stewart  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

**24.D. Question 4: Duty to cooperate**

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate? Please provide the following information being as precise as possible:

- why you consider it has or has not complied with the Duty to cooperate and
- what change(s) (if any) you consider necessary to make it comply with the duty to cooperate, explaining why this is the case.

**ANSWER**

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.
Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/902  Respondent: 15389697 / Oliver Stewart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that new sites have been proposed in this consultation which have not previously been considered, which is not appropriate at this stage.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/901  Respondent: 15389697 / Oliver Stewart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Re: Responses to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1334   Respondent: 15389761 / Jane Hinde   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to register with you my strong objection to the proposals laid out in the local plan and in particular to the removal of this village from the green belt.

I think the total number of new homes you propose is quite unacceptable for this area as I believe our basic services such as drains, medical centres, schooling and transport facilities will not cope with this additional population.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2409   Respondent: 15390273 / Roderick Hutchison   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the housing development at Clockbarn Nursery. Once again the proposed development would greatly increase the traffic along a narrow road, particularly given that the Marina development will also lead to increased traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2406   Respondent: 15390273 / Roderick Hutchison   Agent:
I object to the proposed new development at Garlick’s Arch. GBC has failed to demonstrate the need for a further 400 houses in addition to those already included in the Plan, or the need for such an extensive industrial/warehouse development. The area, which is currently Green Belt, includes ancient woodland, which, once lost, could never be replaced. The area already has an established industrial site at Slyfield. Given the latest Employment Land Needs Assessment 2015 showed an expected 80% reduction in the required employment floor space from the previous draft plan, this could easily be accommodated at Slyfield.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the new A3 interchange at Burnt Common. The roads around Send are already congested: already at peak times it is difficult to safely turn out of Boughton Hall Avenue onto the Portsmouth Road, and the proposed development is likely to result in near-permanent gridlock at Burnt Common. In addition, the road through Clandon is unsuitable for large vehicles: I have seen several ‘near misses’ as lorries come round narrow bends straddling the middle of the road. The inevitable increase in commercial traffic would make these roads far more dangerous.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the proposed development west of Winds Ridge and Send Hill. This new site was not included in the original plan and has not been consulted on. Apart from the loss of Green Belt this would entail, I understand the area includes vented land fill, increasing the risk of building on the site. In addition, the site is served by a narrow single track road, which could not safely handle the increase in traffic which the development would produce.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5347  Respondent: 15390273 / Roderick Hutchison  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the failure of the Plan adequately to consider the requirements that the housing levels in the Plan will impose on the already saturated local infrastructure around Send. Roads, schools and medical facilities will be unable to cope.

I object to the failure of the Plan to identify sufficient brownfield sites within the urban area, which should be the first priority for development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5340  Respondent: 15390273 / Roderick Hutchison  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of Send and other nearby villages from the Green Belt. The inevitable result of this would be extensive development effectively removing the buffer between Guildford and Woking. Amongst the areas lost would be school playing fields and woodland: a great loss of amenity for all residents. Removal of Green Belt status also leaves the affected areas vulnerable to further undesirable development in future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1344  Respondent: 15390337 / Daniel Smith  Agent:
### Comment ID: PSLP16/2404  Respondent: 15390337 / Daniel Smith  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

The site is not appropriate because:

- There is no sustainable transport infrastructure.
- The site is liable to frequent flooding
- The site has Ancient woodland and is a wildlife habitat, but no wildlife report for the site is in the Plan.
- There are no plans to improve local schools, medical or utilities to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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### Comment ID: PSLP16/2403  Respondent: 15390337 / Daniel Smith  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no schedule for Garlick’s Arch (A43), so the Plan takes no account of the infrastructure required for this site. It is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

North facing ramps to the A3 at Burnt Common would be a disaster for local communities, which do need to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic. E.g. all traffic from London/M25 to Woking would go through Burnt Common, Send and Old Woking. This is not sustainable as this cannot be improved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5342  Respondent: 15390337 / Daniel Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the employment strategy and impact at Garlick’s Arch (A43) (Policies E2 and E5)

The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been for there decades employing local people and are therefore clearly sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5335  Respondent: 15390337 / Daniel Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

There is too much traffic in our villages already and this plan will cause more congestion in Ripley, Send and Clandon, with no plan to improve that.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong></td>
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<tr>
<td>1. I object to the lack of proper infrastructure planning for sites (Policy I1)</td>
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<tr>
<td>The Plan does not identify adequate infrastructure improvements to support the huge scale of development, especially at Garlick’s Arch (A43) which has no infrastructure projects in the Infrastructure Schedule to support it. Local services, utilities and sewerage, doctors etc. are at or close to capacity.</td>
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<td>There are no plans to improve the capability of the medical and police/emergency services to cover the 5000+ houses in the north east of the borough.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong></td>
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<tr>
<td>1. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)</td>
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<td>The A3 or M25 would have to be improved before any development is done. Highways England has no plans to even start considering improving the A3 before 2020. Clearly no real improvements are possible in the timeframe of this Plan so the developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), should not take place.</td>
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<td>I wish these objections to be fully taken into consideration and that the Plan is amended accordingly.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to not protecting the Green Belt (Policy P2)

There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2016).

These are my main reasons/ I object on these grounds / …
1. I object to the Local Plan as the development proposed is not sustainable (Policy S1)

The plan will damage local communities by over development, especially Ripley, Send and Clandon. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve the infrastructure for Garlick’s Arch.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5339  Respondent: 15390337 / Daniel Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the Borough Wide Strategy (Policy S2)

The Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1347  Respondent: 15390369 / Lewis Thorpe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The 4 policies (A42/A43/A43a and A44) are totally unacceptable for the village and there are far more suitable places for development, especially within Guildford and therefore I suggest GBC considers alternative sites. Send cannot cope with the level of development proposed and any development will have a detrimental effect on the local community and environment.

Please can I request that my comments are shown to the Planning Inspector who will decide on the proposed developments in Send and the surrounding area. Please can you also confirm receipt of my letter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
In addition to the other proposals, I object to Policy 42, 45 houses proposed to be built in Clockbarn Nursery, Tannery Lane. Tannery Lane is a country, single access and the staggered cross roads- junction with Send Road is already dangerous, especially due peak times. This will just add to the growing congestion in Send. Planning permission has previously been given for 64 apartments at the Tannery and for building the marina, both of which will generate additional traffic (large vehicles for boats etc) The lane cannot cope with any more traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Additional housing (A43) at Garlick's Arch will exasperate and add to the local chaos on the roads and the already stretched amenities. Therefore strongly object to building 400 Houses and 7000 sq metres of industrial space at Garlick's Arch. The site floods and is covered by ancient woodland. The industrial is not needed as there are many offices and warehouses sitting idle in the local area. Fill these sites first before developing more empty units. Any new industrial units should be built at Slyfield where there is a ready an established site and the roads can cope with the traffic. Guildford's housing requirements have been shown to be grossly exaggerated and they have refused to disclose their calculations. With proper use of brownfield sites this Green Belt site is not needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Policy A43/A43a - I strongly object to a new interchange with the A3 at Burnt Common as this would generate a huge volume of traffic through the village. It is already congested during rush hours especially with the school on Send Barnes Road. When the northbound lanes of the A3 are congested both in the morning and evening rush hours (which is most weekdays) Send Village is totally congested and then many local drivers speed down country lanes (Potters Lane) to avoid Send Road/Send Barnes Road and drive dangerously. Additional traffic will only exaggerate the situation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Policy A44: I strongly object to the development of 40 houses and 2 travellers' pitches at Send Hill...The narrow country lane (Send Hill) would not cope with any additional traffic. It is narrow and already busy with traffic to the cemetery (which has recently been extended). The junction at the bottom of Send Hill with Potters Lane is very dangerous due to speeding traffic off of the A3. Any more traffic would make it even more hazardous. It is an inappropriate location for 40 houses because the road is narrow and single access. Also the soil of the proposed site contains documented unsafe landfill waste registered at GBC. The land is totally unsuitable for dwellings and traveller pitches. I believe the unsafe landfill will be harmful to health of any home owners. Any development there would spoil a high amenity area set in beautiful countryside. The area is used for recreational activities such as walking and would be greatly missed by locals.

Send will not be able to cope with the proposed developments. St Bedes C/E School will shortly be demolished. Currently a new school is being built in the grounds of Send First School. The new infant/middle school when complete will not be able to cope with a large influx of children. There does not seem to be any long term planning in line with GBC proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I strongly object to Send Village being removed from the Green Belt. The Green Belt was intended to be permanent, as required by the national Planning Policy Framework, and there are no special circumstances to justify abandoning it. Send's Green Belt provides an essential buffer stopping Woking and Guildford becoming one conurbation. Local councillors and central government gave a clear election promise to protect the Green Belt and this reneges on it. Developers will be quick to take advantage and there will be nothing to stop them. There is plenty of brownfield land still available for developing in the Surrey area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1. **APPENDIX C**

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

2. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as well as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as well as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard my objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

3. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1351  Respondent: 15390401 / William Stewart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. APPENDIX D

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
issues with the way it considers students and affordability and
flaws in the method for estimating the number of homes needed to support job growth.
• It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2414  Respondent: 15390401 / William Stewart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY A25 - Gosden Hill Farm

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data
• Clandon Cross Roads Area to Bulls Head - 17 incidents
• Bulls Heads Head to Bennett Way - 8 incidents
• Bennett Way to Highcotts Lane - 15 incidents
• Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

• 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  Surrey Fire and Rescue deployed.

2016

• 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
• 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10
  (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
• 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon,
however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as
congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4
way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles)
on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the
Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides
Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with
paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from
encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these
are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops,
offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back
to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before
the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day
during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow,
windong road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send
and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two
schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham
which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.
There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.
Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<tr>
<td>I OBJECT to Policy A43 and A43a on Garlick’s Arch.</td>
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<tr>
<td>The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.</td>
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<tr>
<td>The site is susceptible to flooding and will not make a suitable site.</td>
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<tr>
<td>The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.</td>
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I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)
Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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8. POLICY D3

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. POLICY D3

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5366  Respondent: 15390401 / William Stewart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY D4

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5355  Respondent: 15390401 / William Stewart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. POLICY E1

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5356  Respondent: 15390401 / William Stewart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E2

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.
There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5357  Respondent: 15390401 / William Stewart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E5

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5368  Respondent: 15390401 / William Stewart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E6

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognise that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For
example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the Borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5364  Respondent: 15390401 / William Stewart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E7

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable
residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/5362</th>
<th>Respondent: 15390401 / William Stewart</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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1. POLICY H1

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students are accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.
It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5363  Respondent: 15390401 / William Stewart  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  
Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H2

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5367  Respondent: 15390401 / William Stewart  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H3

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. POLICY I1

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1).

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritising greenfield over urban, brownfield regeneration, the plan creates insurmountable
(and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the Borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognising this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5360  Respondent: 15390401 / William Stewart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY I2

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).
Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 and M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5349  Respondent: 15390401 / William Stewart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (

I object to the fact that the infrastructure has not been properly assessed and is inadequate to deal with current housing levels, with such a large increase in housing the roads will not be able to accommodate the huge increase in traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5361  Respondent: 15390401 / William Stewart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY I3

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to building on the Green Belt because the essential characteristic of Green Belt is its openness and permanence (National Planning Policy Framework paragraph 79).

I set out below my objections to specific policies and matters within the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **POLICY P2**

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.
Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.
There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5369  Respondent: 15390401 / William Stewart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. SITES - POLICIES A1 TO A57

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5354  Respondent: 15390401 / William Stewart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
4. POLICY P4

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognise that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of
sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to rely on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5352  Respondent: 15390401 / William Stewart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)
The borough wide strategy is poorly considered. It proposes 13,860 homes being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN are not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would
remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighbouring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. Questions posed by Guildford Borough Council as part of its consultation.

Questions from GBC

24.A. Question 1: The evidence base and submission documents

The Proposed Submission Local Plan: strategy and sites is based on up-to-date evidence. The evidence base documents contributing to the preparation of the plan are listed in Appendix D and can be found on our website (links open in a new window).

Do you agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant?

ANSWER

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
24.B. Question 2: Legal Compliance

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole is legally compliant? Please provide the following information being as precise as possible:

- why you consider it is or is not legally compliant and
- what change(s) (if any) you consider necessary to make it legally compliant, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/911  Respondent: 15390401 / William Stewart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

24.C. Question 3: Soundness

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound? Please provide the following information being as precise as possible:

- why you consider it is or is not sound and
- what change(s) (if any) you consider necessary to make it sound, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.

3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt. Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites— which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.

2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

3. Much of the infrastructure required to support the level of development proposed is outside the Council's control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer's business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

5. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation.

6. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation.

7. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound.

8. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018.

9. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars.

10. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham.

11. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework.

12. The proposal for Garlick's Arch was added to the draft Local Plan without any prior consultation under Regulation 18.

13. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

14. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.

15. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councillors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.
16. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

17. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

18. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

19. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SLP16/912  Respondent: 15390401 / William Stewart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

24.D. Question 4: Duty to cooperate

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate? Please provide the following information being as precise as possible:

- why you consider it has or has not complied with the Duty to cooperate and
- what change(s) (if any) you consider necessary to make it comply with the duty to cooperate, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.
This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/908  Respondent: 15390401 / William Stewart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that new sites have been proposed in this consultation which have not previously been considered, which is not appropriate at this stage.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/907  Respondent: 15390401 / William Stewart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Re: Responses to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
As a West Horsley resident for the last thirty years I am writing to you as I am very disturbed by the proposal to take the Horsleys out of the Green Belt. In addition the proposals to infill parts of the village look unsustainable.

I believe West Horsley currently has approximately 1110 homes and the proposal is to use Green Belt areas and to increase the size of West Horsley by 35%. This will transform Horsley from a traditional village to a town stretching its current infrastructure to intolerable limits. Also some of the proposals seem to suggest housing developments different in character to the rest of the village.

Essential facilities such as shops, medical centre etc will not be able to cope with the additional volumes. Roads, especially the A246, are in a poor state of repair and are subject to heavy congestion at peak times.

I urge you to seriously consider the implications for the current residents before proceeding with the proposal to increase the size of the village so dramatically.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I am writing to complain about Guildford Borough Council's plan to build hundreds of houses in and around Send. I have loved and walked over the countryside in this area for many years and am concerned that its whole character will be destroyed. How can the current narrow roads, schools, medical services and facilities be expected to cope with such a huge population influx, and why do you target unspoilt greenfield sites rather than urban brownfield sites?

I fear for the future of this pleasant area. Please do not go ahead with this scheme.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1352  Respondent: 15390497 / James Mylet  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I grew up in Send and my mother is [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] I wish to object to several points in the above plan.

1. I object to the plan to build 400 houses and 7000 sq mtrs of Industrial Units at Garlick's Arch. This is Green Belt land and has an ancient woodland full of wildlife.
2. I object to the poor quality of air concerns. The noise and air pollution is already bad. The extra traffic from the additional buildings will lead to even poorer air quality for residents in Portsmouth Road.
3. I object to the Infrastructure Schedule. The Plan takes no account of the infrastructure needed for the Garlick's Arch site.
4. I object to removing Send, Send Marsh, Ripley and Clandon from the Green Belt. There are no special reasons for doing this.
5. I object to building in areas at risk of flooding. The field at Oldlands Farm is often
6. I object to the building of a 4-Way junction with the A3/A247. This would lead to severe traffic jams in Send, Burnt Common, Send Marsh and Clandon.
7. I object to the huge amount of development in one area
8. I object to our Villages being turned into Towns. My Mum bought her house in a village because she liked the village atmosphere. My children, her grandchildren, enjoy visiting her in the countryside. These changes will affect all of our family

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2420  Respondent: 15390593 / Georgina Gill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt. How can land be identified as Green Belt ie: protected and then ‘unprotected’ like this – it is a mockery of the whole concept of protection!

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is simply too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars. Commuters going to Effingham station are NOT going to cycle or walk!
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads. These are small lanes which don’t have the capacity to take this sort of traffic.
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   4. The increase in traffic will create a danger to those who do cycle (and pedestrians walking to the woods with their dogs), due to the absence of any cycling paths and the lack of pedestrian footpaths (as there is no space to provide them)
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity. Where are all these extra commuters going to park? This will lead to further development of common land which is again ‘protected’.

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, which is already in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9) I object to the fact the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I simply fail to see how the local planning committee can be even reconsidering this application with so many people objecting.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1354  Respondent: 15390625 / J Lewis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
My wife and I have been residents in West Horsley since 1958 and our 3 children attended local schools. During this time we have witnessed increased traffic on the roads due to housing infilling. This has caused queueing during busy periods at junctions such as East Lane into Ockham Road and difficulties in parking when shopping in the village etc. It is quite obvious that West Horsley has reached the limit for sensible development and the proposals for building large numbers of additional houses would be quite out of scale with the existing infrastructure.

There appears to be no justification or planning behind the proposals which seem to be driven by developers rather than planners. There are certainly no exceptional circumstances to justify removing the Horsleys from the Green Belt and, as far as I am aware, no justification has been put forward by Guildford Borough Council.

If there is a need for so many houses in Surrey, surely it would be far better to build a new town situated well away from existing settlements otherwise much of the character of Surrey's attractive villages will be spoiled for ever. I find it astonishing that Guildford Borough Council should have left these proposals to be assessed by outside consultants rather using its own knowledge and expertise in co-ordination with local residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The "objectively assessed need" figure of 693 homes a year is too high.

A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.

The current SHMA inflates the proposed housing figure due to failure to correct for errors in the historical data for international migration flows, issues with the way it considers students and affordability and flaws in the method for estimating the number of homes needed to support job growth.

It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan's proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas, (Surrey hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2425  Respondent: 15390785 / Francesca Molossi- Murphy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Gosden Hill development being in the Local Plan The land in Gosden Hill does exactly what the Greenbelt was designed to It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.
Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham's sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of de/JLe.Lo

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England's requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an "aspiration" in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the inclusion of the land at Garlick's Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick's Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (BB). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick's Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council's own Green Belt & Countryside Report does not address Garlick's Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy 13).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy 14)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy 11)

Furthermore, several electricity pylons run through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5390  Respondent: 15390785 / Francesca Molossi- Murphy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)
I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick's Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the sustainable employment policy (Policy El)

If developed, the new employment site at Garlick's Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (Blc), general industrial (B2) and storage and distribution (BS) at Garlick's Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick's Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to the location for new employment floorspace at Garlick's Arch - Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick's Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/5389  Respondent:  15390785 / Francesca Molossi-Murphy  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick's Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/5402  Respondent:  15390785 / Francesca Molossi-Murphy  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT. Tourism and visitors do not depend on new visitor "attractions" and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/"Disneyfication". Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many "leisure and visitor attractions" already. The case for creating more is not made and no examples are given. Instead, the plan's explicit priorities should be:

1. To protect the borough's prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford's river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An "English town break" (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a South West Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5399   Respondent: 15390785 / Francesca Molossi-Murphy   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT (POLICY H1 - Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.
Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council's timidity is a case of "regulatory capture" by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog's Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H3 - Rural Exception Homes

I object. This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the "mix" this can include "market" housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue.-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove "exceptional circumstances."

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 8,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

I OBJECT to the lack of proper infrastructure planning for sites.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick's Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents' in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley·and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick's Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy 12)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 &- M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

1. I OBJECT to poor air quality concerns (Policy 13)

Paragraph 4.6.27 of the Plan states that "Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health." The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document: complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick's Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a 'special circumstance' and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC's Green Belt & Countryside Report does not address Garlick's Arch, so there is no evidence base to support including this site.

Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/5386</th>
<th>Respondent: 15390785 / Francesca Molossi- Murphy</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
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Do you consider this section of the document: complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough's identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick's Arch (A43) is identified on the Environment Agency's flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council's SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5382  Respondent: 15390785 / Francesca Molossi- Murphy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan.

I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to
increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to one specific aspect of the consultation process which is fatally flawed. The Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the green belt." This is demonstrably untrue and I believe it is deliberate untruth which compromises the consultation process. Even the council's position in the draft Plan is that exceptional circumstances exist so as to justify taking areas out of the Green Belt - which by definition has a detrimental impact on the Green Belt. This unqualified statement cannot be justified and is simply untrue. By giving this unqualified assurance to residents that there is no detriment to the Green Belt residents may have been reassured and dissuaded from responding to the consultation.

I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (We assume the document was delivered to most houses in the Borough.) I have no doubt that that people will argue before the inspector that the consultation process was flawed and ineffective because of this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the Borough Wide Strategy (Policy S2)

a) The borough wide strategy is poorly It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

b) The Housing number is based on pre-Brexit data for economic and population growth, including These now need to be revised downwards, possibly quite seriously.

c) The housing number is based on an arbitrary Housing Market Area (HMA): the "West Surrey" tri-borough area of Guildford, Woking. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, "West Surrey" is much too small. Half of Guildford borough's residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside "West Surrey". Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make "West Surrey" reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour's "need". Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am writing to object to the proposed new development of Normandy and Flexford. It is disproportionate and unjustified.

Key Points.

School - Is there a proven need for a new school in this area? Why do we need another secondary school when we have schools in the area which are under subscribed!

Expansion to existing schools could be a better and cheaper option.

Roads - To build another 1,100 house would double the size of this Village - increasing traffic in an already busy area. We are queuing in the peak times to get onto the main 'A' roads. Westwood and Glaziers Lane are just that 'Lanes' with narrow railway bridges and one way traffic in places, there is no room to widen these roads to cope with the extra traffic this building plan would bring. We already have problems with queuing traffic on the main Guildford to Aldershot road - with so much building in this surrounding area what is proposed to help ease congestion?

Health issues for residents - there will be so much traffic that the air pollution will be very poor together with the years of works traffic which will create noise and pollution. What considerations have the council given to this?

Green Belt - If this development is built it will increase Normandy by 100% ripping through the heart of the Village and destroying our rural environment. I have lived in Normandy all my life and have seen the increase in our wildlife as never before, a pleasure to see, but built on this land and you destroy all that is good in our Village our rural environment. The loss of beautiful views, green pastures, important hedgerows, streams and trees, the list is endless and you would destroy all! What ever happened to the 'Protection of Green Belt'? It seems to me that this is forgotten about when local authorities can gain, they move the goal post to suit them!! !

I hope you will think again and have some respect for this Village and its people - don't change our green fields into an urban sprawl. Let's remain the 'Surrey Hills' and not become known as the 'Surrey Builds'!!! !!!!!!!!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5381  Respondent: 15390881 / Richard Goodworth  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to register my objection to the 2016 Draft Local Plan, which I believe has not been thoroughly thought through in terms of housing need and proposed infrastructure.

Furthermore, I believe it is important that we have clarity on the viability of a tunnel taking the A3 underneath Guildford before committing to building on Gosden Hill Farm, where the tunnel is likely to begin/end.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/5383  Respondent: 15390913 / Linda Berry  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to strongly object to the councils plan to remove the greenbelt status from a number of our local villages, i.e. Chilworth & Shalford.

As a local resident living close to these villages, I am of the opinion that further developments on greenbelt protected land will have a serious negative impact on the area, which is already heavily congested with traffic during the rush hour period.

We are very fortunate to live in such a beautiful and relatively unspoilt part of the country, so let’s keep it so. These villages cannot take anymore development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2424  Respondent: 15390945 / Simon Penney  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to register my objection to the above proposed development on the grounds listed below. Whilst I live outside the borough of Guildford the proposed development will impact the local area in and around Cobham.

- Object to the removal of the Former Wisley Airfield from the Green Belt. The area serves a vital role in preventing urban sprawl from London and a development would create an urban corridor stretching from London to Guildford.
- No exceptional circumstances have been established to warrant removing the site from the Metropolitan Green Belt.
- There is ample brownfield land in urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land.
- Object to the disproportionate allocation of a proposed increase in housing to the nearby localities of Ockham, Ripley, the Horsleys and Effingham.
- Object to the threat the Local Plan as drafted poses to the historic rural settlements of Ockham, Hatchford and Downside.
- The plan calls for Ockham, a hamlet of 159 residences to be subsumed into development, on presently open land, with 2,000 dwellings and other urban-style buildings up to five storeys high and a population density higher than most London boroughs.
- Hatchford, south of the M25, has some 60 residences off narrow Ockham Lane that would be greatly affected by the proximity of development.
• Object to the potential harmful impact on transport, local roads and road safety by the suggested development. The result of an additional 2,000 homes would be an estimated 4,000 additional cars together with other vehicles, including HGVs, to service the development.
• The increased traffic would cause congestion and danger on the narrow rural roads in Ockham, Hatchford, Downside and Cobham. Cobham is the closest shopping centre to the proposed development. The village could not cope with the additional traffic and car parking involved in serving some 5,000 additional occupiers at the site and would experience a significant increase in stationary/idling traffic at peak times and at junctions.
• Due to the absence of cycling paths and the lack of footpaths (and the space to provide them) the assertion that the development would result in a meaningful shift to cycling and walking is unbelievable. The increased traffic would add danger to cyclists and pedestrians (including those increasingly using local roads for recreational purposes).
• There would be an increase in the already severe congestion on the Strategic Road Network of the A3 and M25 and the junction of those as well as local roads. The current planning application by RHS Wisley would already have significantly added to visitor traffic. Any proposed secondary schooling would add additional congestion.
• The lack of suitable public transport. The local rail stations of Effingham and Horsley could not cope with the proposed increase in passenger traffic and car parking is already at capacity. In the refused planning application there had been a suggestion that Cobham & Stoke D’Abernon Station could be used. That or use of stations further north at Weybridge or Walton would increase congestion and pollution on local roads in Elmbridge.
• Object to the issue of air quality not being taken seriously. Air pollution in this area in the north of the Borough of Guildford and the south of the Borough of Elmbridge and particularly near the M25/A3 junction already exceeds EU-permitted levels. Additional traffic would worsen the situation, affecting the health of all current and future residents.
• Object to insufficient consideration being given to the environmental and ecological value of the site and the area around it, taking account of the Thames Basin Heath Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCl).
• The area is a haven for wildlife, some of which is already endangered. The introduction of residences would mean the import into an ecologically sensitive area not only of humans and their increased footfall, but also of pets, and cats and dogs in particular, that can have a devastating effect on wildlife. Protected species on and near the site and wildlife corridors would be destroyed.
• Objections are supported by the unanimous rejection of application no 15/P/00012 by the Planning Committee at Guildford Borough Council on 8th April 2016 on the recommendation of Planning Officers. The Planning Report identified the serious concerns now being highlighted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I formally object to the removal of the green belt protection from the local villages as proposed in the new local plan.

Surely before any proposed alterations to the area and any developments approved in principle, the local infrastructure must first be reviewed.

As an example from Chilworth via New Road the traffic backs up past the Tilling Bourne School on a regular basis. After turning right towards Shalford again the traffic backs up immediately all the way to the roundabout on the A381 the build-up is all the way to Guildford. The A281 before Bramley coming from Dunsfold backs up often for 2 miles.

The housing proposals for Dunsfold, Alfold and Cranliegh will add thousands of new properties and therefore cars vans etc. to the local roads these will become rat runs with people trying to get to Guildford.

Traffic is not the only concern. Doctors, Schools are already at breaking point will read reviewing and will become a major concern for many people.

As this is an area of outstanding natural beauty losing any of the green belt would cause irreparable damage. I therefore would need to see the infrastructure problems dealt with and how the finance for such works provided before any such removal of the green belt protection is implemented.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/1358  **Respondent:** 15391041 / Anne Lawrence  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Transport evidence is not yet fit for use and major transport issues are unresolved e.g. another river crossing, a central bus facility.

The Plan is not ready for an inspector.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/5392  **Respondent:** 15391041 / Anne Lawrence  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I support the Guildford Residents Association (GRA) response and oppose Guildford expanding by a quarter

The evidence is flawed and is exaggerating the need for expansion as shown clearly by the GRA report on housing. °

Expansion should be constrained to protect the character of town and country in our congested gap town. °

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5397  Respondent: 15391041 / Anne Lawrence  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We desperately need homes for the elderly in the town centre, to buy not let and near transport hubs. We need to free up family houses. °

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5394  Respondent: 15391041 / Anne Lawrence  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Allowing Green Belt development to pay for transport schemes will simply generate yet more traffic from more homes, fuelling congestion. °

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5396  Respondent: 15391041 / Anne Lawrence  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I oppose unjustified Green Belt development.

It is irresponsible to squander every last resort greenfield site in a single Plan, robbing future generations.

Brownfield opportunities are being ignored – we need homes in the centre (not 40% more shops), much more accommodation on campus for students.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5393  Respondent: 15391041 / Anne Lawrence  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It is unacceptable that, unlike other places, Guildford is choosing not to constrain its overall housing growth.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1361  Respondent: 15391169 / S.M. Smith  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to Send village being removed from the green belt.

The green belt was intended to be permanent, as required by the national planning policy framework and there are no special circumstances to justify abandoning it.

I object to building 45 houses at Clockburn Nursery because of inadequate access and traffic volume. The junction is too dangerous already and will be made much worse.

I object to building 400 houses and 7000 sq. metres of industrial space at Garlick’s Arch, opposite Send Marsh Road. With proper use of existing brownfield sites this Green Belt is not needed the land used to be the property of Merton College, what has changed this status?

I object to the development of 40 houses and 2 travellers pitches at Send Hill. It is an inappropriate location because the narrow width single access country road provides insufficient access.

I object to a new interchange with the A3 at Burnt Common because Send would have to take traffic from the proposed new houses at Wisley Airfield, Gosda Hill, Burpham and Blackwell Farm. Much of this traffic to and from the A3, M25, Woking and Guildford would go through Send. Send Road is already at its capacity for through traffic and could not cope.

Please show my objection to the planning inspector, as there are plenty of other sites, especially brownfield sites, which could be used before the green belt needs to be used. Local councillors and central government gave a clear election promise to protect the green belt and this breaches it, especially at the short notice that the above proposals have suddenly been thrust upon us, without due consideration and deliberation as to the detrimental effects on the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong></td>
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<tr>
<td>I object to Policy A25 Gosden Hill Farm, 2,000 houses, on Green Belt Land.</td>
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<tr>
<td>I object to Policy A35 Wisley Airfield, 2,000 houses in the Green Belt.</td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong></td>
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<td>I object Policy A42 Clockbarn Nursery. Tannery Lane. 45 Houses.</td>
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<td>As Planning permission has already been granted for development of a marina and 64 apartments (Despite strong local objection) in this narrow lane. Further development will only increase traffic in this narrow lane to an already dangerous junction with the A247.</td>
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object Policy A43 Garlick’s Arch. Send Marsh/Burnt Common/Ripley

To the building of 400 houses on this site, Because it was not include in the regulation 18 draft and has not been previously consulted upon.

It is on Green belt, permanently protected by NPPF to prevent the merging of settlements. There are no exceptional circumstances to take this site out of the Green Belt.

The site is covered in Ancient Woodlands, containing trees that have stood since the 16th Century, this area must be conserved for future generations.

I object Policy A43 cont… to the Warehousing and Industrial units which are included in the Policy.

Employment Lands Needs Assessment (ELNA) 2015 shows an 80% reduction from the previous ELNA carried out by GBC in 2013 for employment space.

If Industrial and Warehousing units are required, I question why the Cassidy Slyfield Ltd. North Slyfield site, allocated in 2014 By Guildford Council for Industrial and Warehouse use, was withdrawn from the Local Plan recently.

Surely expanding an existing Brown field industrial area is better than creating a new one on Green Belt Land!

Also heavy traffic would be attracted to Garlick’s Arch site from the M25 and A3, a lot of it using the A247, which is not suited to this traffic!

I object because GBC’s Transport Assessment was not available to Councillors for the vote taken on 24th May for these proposals. It was published on 6th June! Infrastructure requirements must be assessed before major proposals can be voted on.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I object Policy A43a, the North facing slip road to from A3 at Send Marsh/Burnt Common

On the grounds of the increase in traffic flow. Our roads already strain to cope with existing levels of traffic. Especially all the approach roads to the A3, and in particular the A247 to and from the Burnt Common roundabout. Which passes a school, a Doctors surgery and goes straight through the centre of Send, linking Guildford and Woking. The A247 is 2 way road and not suitable for the high levels and heavy traffic this will create.

I object because GBC’s Transport Assessment was not available to Councillors for the vote taken on 24th May for these proposals. It was published on 6th June! Infrastructure requirements must be assessed before major proposals can be voted on.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2433  Respondent: 15391329 / Marian Tarrant  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object Policy A44. Winds Ridge and Send Hill

I object to this development because it was not include in the regulation 18 draft and has not been previously consulted upon.

It is on Green belt, permanently protected by NPPF to prevent the merging of settlements. There are no exceptional circumstances for taking this site out of the Green Belt.

The site contains documented unsafe landfill waste which is currently vented.

The site is also in a single track lane which is unsuitable for larger vehicle access, which the two traveller pitches would require.

The Lane is the site of the Cemetery, a peaceful place to reflect and remember those who have gone before us.

I object because of the increased pressure on local facilities, Doctors, Schools etc. that 485+ homes would bring to Send. 485 new homes would generate circa half a class, the new amalgamated Send school has no capacity for these pupils.

Send does not need, nor do we want a 25% increase in population.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5403  Respondent: 15391329 / Marian Tarrant  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As a resident of Send I object to the following:

I object Policy P2. In-setting of Send and Ripley.

I object to taking Send and Ripley out of the Green Belt, I see no exceptional circumstances for this.

Vulnerable land includes, School playing fields and land adjoining the Wey Navigation Canal, a National Trust facility.

Also, Villages to the East of the A3 maintain Greenbelt status.

I object to building on ‘Green Belt’ land, which are the lungs of London. And are meant to prevent Urban spread in the countryside and the linking of settlements. In this case Send, Ripley and on a broader scale to Woking and Guildford.

Local and Central Government gave clear commitment that the green belt would be protected. These proposed development go against this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5405  Respondent: 15391329 / Marian Tarrant  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the disproportionate quantity of proposed development in the Send, Ripley, Wisley, Horsley, Clandon, Merrow area of the Borough.

I see these developments solely as commercial gain for the developers and of no benefit to the existing residents of Send, Ripley and the surrounding area. In fact the level of development Proposed will be detrimental to those of us living here.

I request my objections be shown to the Planning Inspector.

Please take into account my objections when making your decision.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/913  Respondent: 15391329 / Marian Tarrant  Agent:
**Proposed Submission Local Plan: strategy and sites 2016**

**Question 5: The examination**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object because GBC have not followed correct process. Since 2014 GBC has made changes on every major proposed development in Send and have now added a major road junction. Policy A43a.

The 2014 proposal for 430 house in Send was reduced to 185 in April 2016. In May 2016 policy A43 was added with 400 houses and Industrial units. These significant changes require full consultation under Regulation 18. Regulation 19, which GBC are using is not appropriate in this instance.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPA16/1362  **Respondent:** 15391361 / Paul Thorpe  **Agent:**

**Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

The 4 policies (A42/A43/A43a and A44) are totally unacceptable for the village and there are far more suitable places for development, especially within Guildford and therefore I suggest GBC considers alternative sites. Send cannot cope with the level of development proposed and any development will have a detrimental effect on the local community and environment.

Please can I request that my comments are shown to the Planning Inspector who will decide on the proposed developments in Send and the surrounding area. Please can you also confirm receipt of my letter.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/2434  **Respondent:** 15391361 / Paul Thorpe  **Agent:**

**Proposed Submission Local Plan: strategy and sites 2016 / Policy A42**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
In addition to the other proposals, I object to Policy A42, 45 houses proposed to be built in Clockbarn Nursery, Tannery Lane. Tannery Lane is a country, single access and the staggered cross roads- junction with Send Road is already dangerous, especially due peak times. This will just add to the growing congestion in Send. Planning permission has previously been given for 64 apartments at the Tannery and for building the marina, both of which will generate additional traffic (large vehicles for boats etc) The lane cannot cope with any more traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2432  Respondent: 15391361 / Paul Thorpe  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  
Answer (if comment is on questions 1-7 of the questionnaire): ()

Additional housing (A43) at Garlick's Arch will exasperate and add to the local chaos on the roads and the already stressed amenities. I therefore strongly object to building 400 Houses and 7000 sq metres of industrial space at Garlick's Arch. The site floods and is covered by ancient woodland. The industry is not needed as there are many offices and warehouses sitting idle in the local area. Fill these sites first before developing more empty units. Any new industry units should be built at Slyfield where there is already an established site and the roads can cope with the traffic. Guildford's housing requirements have been shown to be grossly exaggerated and they have refused to disclose their calculations. With proper use of brownfield sites this Green Belt site is not needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2430  Respondent: 15391361 / Paul Thorpe  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  
Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A43 A43a I strongly object to a new interchange with the A3 at Burnt Common as this would generate a huge volume of traffic through the village. It is already congested during rush hours especially by the school on Send Barnes Road. When the northbound lanes of the A3 are congested both in the morning and evening rush hours (which is most weekdays) Send Village is totally congested and then many local drivers speed down country lanes (Potters Lane) to avoid Send Road/Send Barnes Road and drive dangerously. Additional traffic will only exaggerate the situation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPS16/2429  Respondent: 15391361 / Paul Thorpe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A4 strongly object to the development of 40 houses and 2 travellers' pitches at Send Hill. The narrow country lane (Send Hill) would not cope with any additional traffic. It is narrow and already busy with traffic to the cemetery (which has recently been extended). The junction at the bottom of Send Hill with Potters Lane is very dangerous due to speeding traffic off of the A3. Any more traffic would make it even more hazardous. It is an inappropriate location for 40 houses because the road is narrow and single access. Also the soil of the proposed site contains documented unsafe landfill waste registered at GBC. The land is totally unsuitable for dwellings and traveller pitches. I believe the unsafe landfill will be harmful to health of any home owners. Any development there would spoil high amenity area set in beautiful countryside. The area is used for recreational activities such as walking and would be greatly missed by locals.

Send will not be able to cope with the proposed developments. St Bedes C/E School will shortly be demolished. Currently a new school is being built in the grounds of Send First School. The new infant/middle school when complete will not be able to cope with a large influx of children. There does not seem to be any long term planning in line with GBC proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5404  Respondent: 15391361 / Paul Thorpe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I strongly object to Send Village being removed from the Green Belt. The Green Belt was intended to be permanent, as required by the national Planning Policy Framework, and there are no special circumstances to justify abandoning it. Send's Green Belt provides an essential buffer stopping Woking and Guildford becoming one conurbation. Local councillors and central government gave a clear election promise to protect the Green Belt and this reneges on it. Developers will be quick to take advantage and there will be nothing to stop them. There is plenty of brownfield land still available for developing in the Surrey area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2437  Respondent: 15391585 / Ann Watson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield, now known as Three Farms Meadows (TFM)

- Allocation for the phased development of a new settlement of 2,068 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of The Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, 36% of the Plan's new housing is proposed in the northeast of the borough (x% of which is allocated to TFM), an area that at present has only 11% of existing housing.

1. S) I object to the loss of the historic rural village of Send. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five stories high and a population density higher than most London boroughs.

- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development.
itself too spread out to assume a reduced reliance on private cars

1. The increased volume of car A proposed development of 2,068 homes would indicate an increase of approximately 4,000 additional cars on the roads.
2. The impact this traffic will have on the narrow rural roads in Ockham and the surrounding areas, also including increased bus and lorry movements
3. The impact this traffic will have on local cyclists and pedestrians, due to the absence of any cycling paths and the lack of proper pedestrian footpaths (and the space to provide them)
4. The impact on the already congested Strategic Road Network on the A3 and A further planning application at RHS Wisley (with increased visitor traffic) and a proposed 600 pupil secondary school would add further congestion at the M25/A3 junction as well as local roads. Infrastructure enhancements to the A3 and M25 would have to be completed before any development commences.

Highways England has stated that they have no plans to even consider improving the A3 before 2020.

1. The lack of suitable public transport. The local rail stations of Effingham and West Horsley cannot cope with the proposed increase in passenger traffic
   • I object to the fact that insufficient consideration has been given to the site's value from an environmental and ecological standpoint, in relation to the Thames Basin Heath Special Protection Area (SPA), the Sites of Special Scientific Interest (SSSI) and Special Nature Conservation Interest (SNCI)
   • I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction is in excess of EU permitted Additional traffic will exacerbate this situation, impacting the health of all current and future residents
   • I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% both wish to see the historic features of the village maintained and to protect the village's green spaces, including the FWA/TFM
   • Lastly, I object to the continued inclusion of a site where the planning application has already been unanimously rejected by GBC's Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5068  Respondent: 15391585 / Ann Watson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Strategic Sites for Development

One, if not the, prime example of the above defects and contradictions is the over heavy focus on developments in the north east of the Borough, and most particularly the continued inclusion of the former Wisley airfield (FWA but known locally as Three Farms Meadows) as a strategic site for development when it is patently unsuited to such designation.

The FWA:
(a) is at the epicentre of the Metropolitan Green Belt to the south west of London and should remain Green Belt.
(b) contains and is bordered by the Thames Basin Heaths SPA and numerous SSCIs, etc;
(c) is completely surrounded and constrained on the north by the A3 (one of the most congested A roads in the UK), and to the west, east and south by narrow, unlit, nonpavemented, twisting rural lanes (Ockham Road North, Old Lane and Ockham Lane) which can barely cope with local access needs;
(d) is immediately adjacent to the A3/M25 junction (one of the most congested and polluted junctions in the UK);
(e) has no existing infrastructure;
(f) [has the area of only two average sized UK farms and] could only be developed as envisaged by the Updated Plan through extremely and totally inappropriate high density, high rise buildings, etc.
(g) produces run off which floods the surrounding area;
(h) is two miles from a rail line with small existing rail stations which are already at capacity in terms of car parking, near capacity in terms of existing passenger traffic, and over capacity with organic growth in the area, leaving aside proposed developments to the east, west, north and south of the line;
(i) has no existing bus services which are in any event inhibited by the narrow and twisting roads.
(j) is distant from existing centres of employment, services, schools, and shops;
(k) is at the centre of Ockham Parish whose assets are small hamlets surrounded by open attractive country side, recreation opportunities, agriculture and rural pursuits, conservation areas, a cherished history and historic buildings;
(l) could only be "sustainable" through major and unsustainable if not impractical development in the surrounding area - major additional roads, houses, schools, transport, public and private services, etc, - and the consequential absorption of further Green Belt and greenfield sites as well as the demolition of existing houses and other buildings to accommodate such facilities and access thereto. This fact seems to be gaining growing recognition in the Updated Plan which now envisages concepts such as "District" and "Local Centres", "Locally Significant Employment Sites" "Transport Hubs/Interchanges", etc - concepts which in this context appear to be simply euphemisms for development "creep".

In similar vein, it is noted that the Updated Plan now unacceptably and without explanation includes within the claimed strategic site for development a significant area of land to the south of the FWA directly bordering the Ockham Conservation Area but not owned by the developer applicant and not included in its latest Amended Planning Application.

I re-iterate that this plan is UNSOUND

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I re-iterate that this plan is UNSOUND

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2438  Respondent: 15391649 / John Girdley  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Please be advised that as a resident of Cobham I strongly object to the Guildford Borough Council draft Local Plan (June 2016) and to the inclusion in the Plan of Site Allocation A35 - The Former Wisley Airfield - for a new settlement with 2000 dwellings.

I fully support the all of the objections set out by Cobham Conservation & Heritage Trust, Cobham Green Belt Group and Cobham & Downside Residents Association. These organisations are well aware that all of the services in the Cobham area, especially health and education, are already overstretched by the demands created by the influx of new residents from the Greater London Area.

For the record, my personal objections are as follows:

• The removal of the Former Wisley Airfield from the Green Belt. The area serves a vital role in preventing urban sprawl from London and a development would create an urban corridor stretching from London to Guildford.
• No exceptional circumstances have been established to warrant removing the site from the Metropolitan Green Belt.
• There is ample brownfield land in urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land.
• The disproportionate allocation of a proposed increase in housing to the nearby localities of Ockham, Ripley, the Horsleys and Effingham.
• The threat the Local Plan as drafted poses to the historic rural settlements of Ockham, Hatchford and Downside.
• The plan calls for Ockham, a hamlet of 159 residences to be subsumed into development, on presently open land, with 2,000 dwellings and other urban-style buildings up to five storeys high and a population density higher than most London boroughs.
• Hatchford, south of the M25, has some 60 residences off narrow Ockham Lane that would be greatly affected by the proximity of development.
• The potential harmful impact on transport, local roads and road safety by the suggested development. The result of an additional 2,000 homes would be an estimated 4,000 additional cars together with other vehicles, including HGVs, to service the development.
• The increased traffic would cause congestion and danger on the narrow rural roads in Ockham, Hatchford, Downside and Cobham. Cobham is the closest shopping centre to the proposed development. The village could not cope with the additional traffic and car parking involved in serving some 5,000 additional occupiers at the site and would experience a significant increase in stationary/idling traffic at peak times and at junctions.
• Due to the absence of cycling paths and the lack of footpaths (and the space to provide them) the assertion that the development would result in a meaningful shift to cycling and walking is unbelievable. The increased traffic would add danger to cyclists and pedestrians (including those increasingly using local roads for recreational purposes).
• There would be an increase in the already severe congestion on the Strategic Road Network of the A3 and M25 and the junction of those as well as local roads. The current planning application by RHS Wisley would already have significantly added to visitor traffic. Any proposed secondary schooling would add additional congestion.
• The lack of suitable public transport. The local rail stations of Effingham and Horsley could not cope with the proposed increase in passenger traffic and car parking is already at capacity. In the refused planning application there had been a suggestion that Cobham & Stoke D’Abernon Station could be used. That or use of stations further north at Weybridge or Walton would increase congestion and pollution on local roads in Elmbridge.
• The issue of air quality not being taken seriously. Air pollution in this area in the north of the Borough of Guildford and the south of the Borough of Elmbridge and particularly near the M25/A3 junction already exceeds EU-permitted levels. Additional traffic would worsen the situation, affecting the health of all current and future residents.
• Insufficient consideration being given to the environmental and ecological value of the site and the area around it, taking account of the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
• The area is a haven for wildlife, some of which is already endangered. The introduction of residences would mean the import into an ecologically sensitive area not only of humans and their increased footfall, but also of pets, and cats and dogs in particular, that can have a devastating effect on wildlife. Protected species on and near the site and wildlife corridors would be destroyed.
• The above objections are supported by the unanimous rejection of application no 15/P/00012 by the Planning Committee at Guildford Borough Council on 8th April 2016 on the recommendation of Planning Officers. The Planning Report identified the serious concerns now being highlighted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1365  Respondent: 15391681 / Martin Pope  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers numbers for financial gain and not for social need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2441  Respondent: 15391681 / Martin Pope  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
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I object to new sites (Garlicks Arch) being introduced as an after thought when it was not even considered in the previous plan. A slip road on the A3 at Burnt Common has been added to the Draft Local Plan without Highways England consent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to a totally unrealistic number of houses for the country Janes to absorb

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to the removal of villages from the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners’ views, or the costs involved in improving the infrastructure, currently out side their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

I object to the 2016 Draft Local Plan as it has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1364  Respondent: 15391713 / Simon Hansford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Effingham

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to give me input and feedback to the local plan for housing development in Effingham and in particular to the revision of its settlement/inset boundary as detailed on page 338 of the local plan.

I am objecting to the revision of the inset boundary to include those areas marked in yellow (in the attached document).

In particular:

1. the amenity land at rear of Middle Farm Place is designated open space and there is no need to include it in the settlement as this increases the ‘crawl’ of the village westwards.
2. the land immediately behind the houses in Middle Farm Close has no access is part of the conservation area and is adjacent to farm land.

4/5. The inclusion of this land enables the urban ‘crawl’ westwards as stated above. Regarding the proposed allocation of the Barn (no 4) for housing, this is a barn of historic interest and from an access feasibility point of view can only accommodate a max of 5-7 residences. Any site allocation for such purpose should reflect a proper feasibility assessment on highway grounds.
In terms of land which could be accommodated within the settlement which at present are not, are the lands shown edged blue. These lands are in the main already developed and are intrinsic to the village configuration, particularly St Lawrence school and the Red House and British Legion. The only potential issue is the vacant land known as Lyons Field adjacent to the school, which is a natural extension to the village boundary and is arguably infill in any event, being bordered on 3 sides by development and on the other by the school playing fields.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Attachment 1.pdf (515 KB)

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Comment ID: PSLPS16/2442  Respondent: 15391809 / Dan Haskins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed development at Clockbarn Nursery. Tannery Lane is narrow, with poor access, and the junction with the A247 is already dangerous. Another 45 residences will create chaos. The apartments proposed for further along this lane, where I enjoy walking and running, alongside many others, simply cannot be adequately accessed via the one track lane. Widening this lane will destroy footpaths and farmland. More concrete, less nature. Another erosion of the Greenbelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2444  Respondent: 15391809 / Dan Haskins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I further object to the Garlick’s Arch development. 400 homes and large industrial space will create not only a crowded, unpleasant living environment, but total traffic meltdown. I am stuck in very high volume traffic on a daily basis, and know that this huge development will bring us all to a standstill. An additional access point to the A3 will ease this, quite the opposite, drivers will simply join the queue in a different place, and queue back onto the local roads too. I therefore also object to the new interchange, that will simply add more queues to the existing ones, not ease any congestion at all.

I have made each of my objections clear, and I hope that those I elected to represent my family and I will listen carefully to the explicit and grave concerns voiced by a whole community.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/2443  **Respondent:** 15391809 / Dan Haskins  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

For similar reasons, I also object to the proposed development on Send Hill, a narrow road already under strain during school pick up times. Increasing traffic volumes and adding further development will add yet more congestion to another quiet, peaceful residential area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/5414  **Respondent:** 15391809 / Dan Haskins  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to communicate my strong objections to the latest planning proposals that will impact Send and Ripley, which will have a very negative impact on the quality of life for my family and others living in Send and Ripley. I am horrified by the level of development that is being proposed by the very people who are meant to represent me and my family. I will detail each objection clear below..

Firstly, I object to Send and Ripley being removed from the Green Belt. The green belt’s purpose was intended to be permanent and there is absolutely no justification for abandoning it. Quality of life for those already living in the greenbelt will be destroyed and the levels and density of housing will create the all manner of pressures on local resources, including roads, doctors, schools etc. I am sure that local councillors don’t need reminding that they are elected to represent the interests of their local constituents, of which they are doing a very poor job. Clear election promises have been broken.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to the proposed Guildford Borough Council Local Plan, particularly the aspects of the plan that propose removing Green Belt status from Send and Ripley, and building residential and industrial sites (elements A42, A43 and A44), for a number of reasons.

I object, as large parts of Send and Ripley are built on low-lying land that is prone to flooding; building houses, roads or other developments as part of this plan could affect the delicate balance of drainage, and adversely affect all parts of Send and Ripley.

I object, as the current road network in Send and Ripley is quite small, compact, and highly-dependent on the A247 for access to both Woking and Guildford. Any increased development in the area will put more pressure on this road. This road has a number of constrictions, both buildings and waterways, so will be bottlenecks and cause gridlock in the area. Development of the Send Hill site (NUMBER) in particular will place huge pressure on the narrow roads of Send Hill (which is built-up on both sides, with no scope to widen it) and Potters Lane, particularly where they each join the A247 northbound to Woking. Sections of the A247 to the south of Send Hill, on Send Barn Lane, are already prone to partial flooding during heavy rain.

I object, as there are no plans to improve public transport in the area. There are no local railway stations, and the current bus services to Guildford and Woking are very infrequent and expensive; residents in the proposed new houses would be forced to use cars to travel and to commute, putting increased pressure on the roads in the area.

I object, as the plans for industrial estates would adversely affect the area; there would be increased traffic, particularly from HGVs (for which the road network is completely unsuitable), adversely affecting current residents. Industrial sites are just not in keeping with the quiet, rural character of Send and Ripley.

I object, as all of the proposed sites are currently green fields and woodland. I have seen deer, rabbits and other animals on these fields, particularly the site opposite Send Cemetery which has proposed developments, and cannot understand why these areas are even being considered for building upon.

I object, as the proposed changes will change the character of Send and Ripley forever. They are tranquil, rural villages, not busy towns; if the residents wanted to live in busy, congested towns, they would not have moved to Send or Ripley. Changing the nature of these villages would be unfair to the current residents. Once Green Belt protection has been removed from these areas, there will be nothing to stop even more development, and they will just become part of the urban sprawl of Guildford and Woking. Is the requirement for further housing in the area more important than protecting the Green Belt?

I object, as there are no clear plans to use the current brownfield sites. Guildford Council should have a register of available brownfield sites; using these would be preferable to eating into precious Greenbelt land.

I object, as the increased traffic and industrial activity will lead to increased pollution (both noise and atmospheric), again this is unfair to the residents who had selected, and expected, a quiet, rural environment.

I object, as there are no plans for increased provision of medical facilities, or schools I colleges, for the extra families who would be living in the proposed new homes. Having moved recently from central Woking to Send, I can personally attest to the effect that the pressure of increased population can have; increased pressure upon local primary schools, waiting a month for a GP's appointment. Has the effect of the increased population upon current residents been considered?
I object, as some of the proposed areas (particularly Send Hilt) have not been included in previous proposals, and so it has not been possible for residents to be consulted with regards to developments in these areas.

I object, as the proposed developments in Send and Ripley account for almost half of all the housing in the current development plan; it seems unfair for Send and Ripley to take such a large proportion of the new homes for the whole of Guildford Borough.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/1367</th>
<th>Respondent: 15391905 / Geoff Gear</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send</td>
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</table>

I object to Send and Ripley being removed from the Green Belt. If this is allowed to happen, it will set a precedent and the majority of Surrey could lose its status.

Election promises were to protect the Green Belt!!

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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</table>

I object to Garlick's Arch being built on as it is a site which is covered in ancient woodland and should be preserved as such. Once our history is destroyed, it will be gone forever and there will be no going back. The local road infrastructure for Send and Ripley is not suitable if the Garlick's Arch proposal for industrial and housing developments are allowed to go ahead. The local roads are totally unsuitable for GV's and a large increase in general traffic.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
### Comment ID: PSLPS16/2446  Respondent: 15391905 / Geoff Gear  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object to a 4 way interchange on the A3 at Burnt Common as this would be catastrophic for Send as this would be the through route to Woking from the M25 and A3. With additional traffic from the proposed 2000 houses at Wisley and also 2000 at Burpham, Send cannot and must not take this.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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### Comment ID: PSLPS16/2447  Respondent: 15391905 / Geoff Gear  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object to the proposal for land in Send Hill to be used for 40 houses and 2 travellers pitches. Again this is new proposal which has not been previously consulted upon.

This area has permanent Green Belt status and the beautiful area would be spoilt by any development. The existing site is currently vented as it has unsafe landfill waste and should not be used. The 2 travellers pitches are also inappropriate because the narrow single track lane would provide insufficient access to the site with their large vehicles, especially the access from the bend on Potters Lane which is extremely dangerous!

There is not the need for such a large amount of housing as GBC has suggested. I realise that there is a need for housing but not to the detriment of losing Green Belt, congested roads, over-subscribed schools and doctors. The South East of England is ready a highly populated area.

In my opinion, these developments SHOULD NOT be approved and NOT be allowed to go ahead.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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### Comment ID: PSLPP16/5417  Respondent: 15391905 / Geoff Gear  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

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Page 2717 of 2804
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The village school is over-subscribed therefore has no places for additional pupils. This would mean any additional children in the area would have to go to schools further afield, thus causing even more congestion on the already too busy local roads during rush hour. With all the extra proposed traffic, Send could possibly be gridlocked all day.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to increases in traffic as the air quality will be compromised and could possibly have a bad effect on residents health in the future. The local doctor's surgery may not be able to cope with such a large influx of new patients from new housing developments - on occasions it is difficult to get an appointment for several days and in some instances there is a wait of up to 10 days.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the final draft local plan and I want my comments below to be seen by the Inspector.

I object to the way that GBC has altered their original plans for the developments in Send and in doing so, are attempting to shortcut the process. Having not followed the correct procedure, this must NOT be allowed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Dear Councillors

My mum and Dad have been talking a lot about the Local Plan and I wanted to say that I am also against a new town. My school is already overcrowded and no room for any more kids. The roads on the way to school are always traffic jammed. It is wrong to build on Green Belt land it is meant for our future, not for developers to make quick money building as it is cheaper than sites that have already been built on.

I object.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Dear Councillors

I write to strongly object to the inclusion of The Former Wisley Airfield within the Draft Local Plan. Councillors recently agreed with local residents and refused their planning application WHY OH WHY IS IT STILL IN THE LOCAL PLAN!!!!!!!

I am one of the younger generation and I do believe in the Green Belt, I want GBC to preserve it for my generation and beyond.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPA16/1368</th>
<th>Respondent: 15397505 / Andrew Krisson</th>
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</table>
I object to a totally unrealistic number of houses for the country lanes to absorb.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5420  Respondent: 15397505 / Andrew Krisson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5419  Respondent: 15397505 / Andrew Krisson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners’ views, or the costs involved in improving the infrastructure, currently out side their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.
I object to the 2016 Draft Local Plan as it has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

I am not going to write pages why I am opposed to the development in Normandy area. My objections are:-

1) We do not need another school as it has been proved that existing schools in Ash and Guildford are already underused and now another one planned in Worplesdon.

2) Go for another traveller site. [Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it]

3) Enlarging the station car park. Passengers are already using our roads for parking as the railway charges are prohibitive.

4) Recently I helped an elderly friend in Westwood Lane by cutting her grass. During that hour 180 vehicles passed me and that was when there were no accidents on the A3 or A31. This was not during the rush hour. With narrow and twisted railway bridges in Glaziers and Westwood Lanes (they are not designated as roads) movement would become very difficult.

5) No shops would be able to compete with Tesco, Sainsbury etc and with the big increase in online shopping. As a child I remember there were 23 businesses in Normandy. Now we have a garage not selling petrol, a music shop for the unprofessionals and a milkman delivery about 100 pints just twice a week.

The loss of arable land is a main concern and I am glad I shall not be around when fertile land is governed by buildings.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 15397729 / G B Harris</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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</table>
Here we go again - being asked to send in our response to a proposal to build umpteen houses in a village that, frankly, neither WANTS nor NEEDS them. I understand our West Horsley Parish Council says it needs 20 houses. I am sure they know what is required for our village yet we are told we need hundreds - this is crazy. We are a small village, people who have moved here have done so because they want to live in a small village. We chose to live here 40-odd years ago for that very reason.

Quite apart from the fact that we do not want all this extra housing it would be impossible to sustain them. To summarise:-

**INFRASTRUCTURE SCHOOLS:**

Drains are at their maximum capacity Raleigh, the State primary school, is always full. Traffic to and from the private schools, Glensesk and Cranmore is enormous

**PARKING:**

The car park at E Horsley Medical Centre (also serving W Horsley) is more often than not totally full and getting a medical appointment is always difficult.

Parking for the shops in E Horsley we only have 1 shop in W Horsley) is more often than not totally full. The station carpark is full on weekdays.

**GREEN BELT MOST IMPORTANT OF ALL**

**BUILDING OF HOUSES SHOULD NOT BE ALLOWED ON GREEN BELT LAND**

I quote from section 9 of the NPPF, which sets out the fundamental aim of green belt policy

"The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open, the essential characteristics are their openness and their permanence"

It also makes clear that the construction of new buildings should be regarded as "inappropriate" for the green belt

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers numbers for financial gain and not for social need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2454  Respondent: 15397793 / Sheila Collins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to new sites (Garlicks Arch) being introduced as an after thought when it was not even considered in the previous plan. A slip road on the A3 at Burnt Common has been added to the Draft Local Plan without Highways England consent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5425  Respondent: 15397793 / Sheila Collins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to a totally unrealistic number of houses for the country lanes to absorb.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5428  Respondent: 15397793 / Sheila Collins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
What is it with G.B.C? Are you determined to ruin our historic villages? For what purpose I wonder?

I invite you to stand in Ripley High St at the junction of Newark lane between 5-6pm approx. The queue sometimes stretches back to the roundabout. All sorts of vehicles use Newark Lane even though it should be width restricted. It is dangerous to walk down and parents have to walk this route in the mornings to get children to school!

The hooting and swearing outside our home on a regular basis is dreadful. And you’re thinking of increasing the traffic!!!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/5427  **Respondent:** 15397793 / Sheila Collins  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/5430  **Respondent:** 15397793 / Sheila Collins  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

And as for assuming you can just take our greenbelt status away! How dare you! We have had more than enough homes built in and around Ripley, Leave us alone!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
<table>
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<tr>
<th>Comment ID: PSLPP16/5426</th>
<th>Respondent: 15397793 / Sheila Collins</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country Janes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners’ views, or the costs involved in improving the infrastructure, currently outside their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

I object to the 2016 Draft Local Plan as it has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<table>
<thead>
<tr>
<th>Comment ID: pslp173/779</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send Marsh/Burnt Common</td>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</tbody>
</table>
I object removing Send Business Park from the Green Belt (4.3.15).

Send Business park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for it’s insetting (removal) from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A42</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the increase in housing proposed in Tannery Lane (site A42)

This has been increased by a third since the 2016 version of the Plan. This will have a significant impact on the already highly congested local rural road network around Send. This is in contradiction to section 2.14a of the Plan which states “Whilst most local roads are single carriageway, with a lane in each direction, it is at their junctions that the free flow of traffic is most often impeded during peak periods, in some cases resulting in significant delays.” And yet there is no proposals to improve the local roads, only to add more junctions with the A3, thereby increasing congestion on the Trunk and Local road network.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the extended development in the Green Belt (Policy P2, Site A43)

I object to Garlick’s Arch (A43) being extended and the resulting urban sprawl. There are no exceptional circumstances for this site being removed from the Green Belt, as required by the National Planning Policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the allocation of 6 Traveling Showpeople sites in A34 Garlick’s Arch

The allocation of 6 Travelling Showpeople plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan. There should be no inclusion of any Travelling Showpeople plots in A43 Garlicks Arch as this development site is for 400 homes and so is not compliant with the minimum of 500 in as stated in section 4.2.24 of the Plan.

Attached documents:

I object to the hiding of development by “deferment” (A24, A25, A26, A43)

This version of the Plan has concealed some development planned to take place by “deferring” it beyond the period covered by the Local Plan. This is designed to have 2 effects:

i) to hide the number of housed actually being built (A24, A25, A26 – total of 1100 deferred, but still being built!) , and

ii) give an excuse for building houses on another site (A43 – 400/650 houses proposed) when they are not needed.

The Plan is self-inconsistent in respect of traveller sites.

A50 Whittles Drive, Normandy, shows on the Site details: “Allocation: The site is allocated for approximately 14 Travelling Showpeople plots ...” Clearly A50 more than covers the total “need” of 8, (page 40, 4.2.22.) and so no “need” exists for this in site A43. This and other inconsistencies in the Plan mean no decision can be made on the basis of this document

Attached documents:
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp171/388  **Respondent:** 15397793 / Sheila Collins  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object the change in policy on affordable homes (Policy 4.2.23)

The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”.

The 2017 version says: *Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.*

So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.

Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses].” That has now been removed, thereby accepting that needing to make greater than normal profit *IS* to be an acceptable reason not to deliver affordable homes. This is a shocking sop to the developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp171/389  **Respondent:** 15397793 / Sheila Collins  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object removing Send Business Park from the Green Belt (4.3.15).

Send Business park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for it’s insetting (removal) from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/394  Respondent: 15397793 / Sheila Collins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Send Business park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for it’s insetting (removal) from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1375  Respondent: 15397953 / Gillian Dobson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no schedule for Garlick's Arch (A43), so the Plan takes no account of the infrastructure required for this site. It is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPA16/1374   Respondent: 15397953 / Gillian Dobson   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans.

But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2456   Respondent: 15397953 / Gillian Dobson   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the inclusion of the land at Garlick's Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick's Arch is protected from development as Green Belt. There are no exceptional circumstances which allow for it's removal from the Green Belt (Policy P2). Central Government state clearly that housing need is not an exceptional circumstance.

The Plan states the preference is to use of previously developed land, but GBC have removed a brownfield site at Burnt Common replaced it with Gartick's Arch.

The site is not appropriate because:

- There is no sustainable transport infrastructure
- The site is liable to frequent flooding
- The site has Ancient woodland and is a wildlife habitat, but no wildlife report for the site is in the Plan
- There are no plans to improve local schools, medical or utilities to cope

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/2455  Respondent: 15397953 / Gillian Dobson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

North facing ramps to the A3 at Burnt Common would be a disaster for local communities, which do need to access the A3 to the north, but the addition will draw in a huge amount of 'through' traffic. E.g. all traffic from London/M25 to Woking would go through Burnt Common, Send and Old Woking. This is not sustainable as this cannot be improved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5436  Respondent: 15397953 / Gillian Dobson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

The Garlick's Arch (A43) proposal would double the built area in the locality, and would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5441  Respondent: 15397953 / Gillian Dobson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the employment strategy and impact at Garlick's Arch (A43) (Policies E2 and E5).

There is no need for new industrial sites at Garlick's Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000 sq m proposed. That site was removed from the Plan without any reasoning.

Furthermore the development at Garlick's Arch would result in the loss of four existing successful rural businesses, which have been for there decades employing local people and are therefore clearly sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5433  Respondent: 15397953 / Gillian Dobson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1).

There is too much traffic in our villages already and this plan will cause more congestion in Ripley, Send and Clandon, with no plan to improve that.

The rural roads in this area are narrow, in poor condition and have no footpaths. 5000 more houses means dangerous and unsustainable traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5442  Respondent: 15397953 / Gillian Dobson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the lack of proper infrastructure planning for sites (Policy I1)

The Plan does not identify adequate infrastructure improvements to support the huge scale of development, especially at Garlick's Arch (A43) which has no infrastructure projects in the Infrastructure Schedule to support it. Local services, utilities and sewerage, doctors etc. are at or close to capacity.

There are no plans to improve the capability of the medical and police/emergency services to cover the 5000+ houses in the north east of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5443  Respondent: 15397953 / Gillian Dobson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy 12)

The A3 or M25 would have to be improved before any development is done. Highways England has no plans to even start considering improving the A3 before 2020. Clearly no real improvements are possible in the time frame of this Plan so the developments at Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25), should not take place.

I wish these objections to be fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5437  Respondent: 15397953 / Gillian Dobson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to poor air quality concerns (Policy 13)

The huge developments being proposed, particularly in the north east of the borough will lead to considerable further congestion and to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5431  Respondent: 15397953 / Gillian Dobson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick's Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5432  Respondent: 15397953 / Gillian Dobson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick's Arch (A43).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5434  Respondent: 15397953 / Gillian Dobson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to development in areas which are at risk of flooding (Policy P4)

The Plan does not take adequate account of flood risk as required by National Planning policy. The site at Gartick's Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council's own assessment. This area has flooded many times in recent years and therefore the Council's assessment is not good enough to be included in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5429  Respondent: 15397953 / Gillian Dobson  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the Local Plan as the development proposed is not sustainable (Policy S1)

13,860 new houses proposed is not sustainable - it will damage local communities by over development, especially Ripley, Send and Glandon. The local communities don't need these houses. Wisley Airfield (A35) and Garlick's Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car.

The Plan has nothing to improve the infrastructure for Garlick's Arch.

The development should be in urban areas where there is sustainable transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5435  Respondent: 15397953 / Gillian Dobson  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the Borough Wide Strategy (Policy S2)

GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

The Plan is unbalanced across the borough; there's too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Glandon [A25]). 36% of all the Plan's new housing is proposed in this area, which has only 11% of the existing housing.

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 15398081 / Jill Pope</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 15398081 / Jill Pope</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to new sites (Garlicks Arch) being introduced as an after thought when it was not even considered in the previous plan. A slip road on the A3 at Burnt Common has been added to the Draft Local Plan without Highways England consent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5438  Respondent: 15398081 / Jill Pope  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to a totally unrealistic number of houses for the country lanes to absorb.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5440  Respondent: 15398081 / Jill Pope  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5439  Respondent: 15398081 / Jill Pope  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners' views, or the costs involved in improving the infrastructure, currently out side their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

I object to the 2016 Draft Local Plan as it has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Thirdly, I object the proposed development of Garlick’s Arch. Building 400 houses and 7000sq metres of industrial space is unnecessary. There is no need for additional industrial space and removes the buffer between the villages and the A3. It seems clear to me that this is a sweetheart deal between the potential developers and GBC. Burnt Common is a brownfield site that could more easily be used. Garlick’s Arch floods easily and regularly and as such makes it an unviable development option. To continue, there is no sustainable transport infrastructure to allow Garlick’s Arch to be successful – the local railway station at Clandon is already very busy and the car-park is already 100% full every day and bus routes are minimal. So, it’s likely each new resident will have a car, leading to increased pollution and health risks.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Secondly, I object to the Burnt Common A3 interchange. As a current resident of Clandon Road, when I leave for work at 6.40am, this road is already busy and I often either have to wait for a considerable period of time to get out of my drive or alternatively turn left out of my house, drive to the roundabout and turn around. The lack of visibility, volume of traffic and potential pollution risks make this an unviable option. There is also the very real risk that building an interchange will ensure that traffic that wants to travel from A3 to Woking will go off this junction through Send and Old Woking, roads that all already at capacity and cannot be improved.

On top of that, I also see first-hand on a daily basis that from 6.45am the A3 from Ripley to M25 is grid-locked. Further development at Wisley Airfield, Gosden Hill and Blackwell Farm will make a bad problem much worse and that won’t be alleviated at all by building an interchange at Burnt Common. This should not happen.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5448  Respondent: 15398241 / Paul McNamara  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to voice my objections to some of the proposals in the Guildford Borough Local Plan which in my view seem to have been poorly thought through.

The roads within the areas in question are nearly all either small country roads, unsuitable for the increased traffic or main roads which for all of the rush-hour and much of the rest of the day are busy, dangerous roads with no need for the large increase in traffic volume that these proposals will undoubtedly cause.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5449  Respondent: 15398241 / Paul McNamara  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
In specific, I object to the proposal to remove Send and other local villages from the Green Belt. Doing this will allow developers carte blanche to develop the last remaining rural areas and will eventually ensure that Woking and Guildford merge into one urban area with all the challenges that occur, i.e. roads, schooling, amenities etc. There are no exceptional circumstances that allow for these villages to be removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5452  Respondent: 15398241 / Paul McNamara  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Finally, I object to the overall GBC strategy (Policy S2) of building 13,860 homes without any constraints. This differs from all other Borough Councils in Surrey. There is also a clear imbalance in where is being developed. 36% of the development is in the Wisley/Send/Ripley/Clandon area which currently has 11% of the housing. Cynically, I wonder where the people who have decided this live – I’m sure they don’t live in any of the areas most impacted.

Please ensure my objections are taken into consideration and as such the proposals are amended accordingly. Please confirm receipt of this email.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1378  Respondent: 15398497 / G J Masson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There is in my view considerable doubt about the validity and accuracy of the projected housing need as identified in the Strategic Housing Market assessment (SHMA) which is giving rise to a proliferation of proposed development schemes along the A3 corridor, much of it on Green Belt land. The Guildford Resident’s Association (GRA) has arrived at much lower figures and the validity of GB,&’s projected forecasts should be rigorously tested.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/5455  Respondent: 15398497 / G J Masson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The present transport links and infrastructure is completely unable to sustain the level of development proposed and the increased traffic flows which will result. The proposed Sustainable Movement Corridor (SMC) is unsound and will result in gridlock and terminal congestion in the Burpham area particularly if the proposed Clay Lane link to Slyfield goes ahead which at present proposes to use the same corridor and northbound slip road onto the A3.

The plan does not address the strategic problem of the A3 which is critical to the area; additional slip roads and roundabouts will only add to the volume of traffic and the ensuing congestion that is being created at present and another route or link to the M25 needs to be considered or other alternatives explored such as widening the A3 or the creation of a tunnel to ease Guildford's traffic problems and the increasing volume of traffic that is being generated on the A3.

It needs radical change before any of the proposed schemes can go ahead as the transport infrastructure is a major constraint on any future schemes and this problem should be addressed before and not after development goes ahead.

There ought to be an alternative to the A3. Consideration should be given to widening and improving the A25/A246 to provide an improved route to the M25 via Fetcham and Leatherhead to the A24 and J9 of the M25.

Any future developments could then be orientated to the A25/A246 rather than cascading yet more traffic onto the A3 and thereby compromising the identities and centres of the existing 'spring line' villages and Burpham in particular which is just not designed to cope with the volume of traffic that will be generated by these proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5457  Respondent: 15398497 / G J Masson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There should in my view be no loss of Green Belt land. It is there for a purpose to protect the existing villages and enhance their environment and the rural nature of the area. An increasing urban sprawl is not a desirable objective and the areas effected should remain as open and permanent Green Belt land as buffers for the existing communities.

Gosden Hill is in the Green Belt. If this scheme goes ahead it is likely to generate pressure from adjoining landowners for their land to be developed over time and it represents the 'thin end of the wedge' which is likely to result in further significant losses for future development and the increasing urbanisation of the area. In my view the proposed development of this land should be resisted.
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<tr>
<th>Comment ID:</th>
<th>PSLPP16/5453</th>
<th>Respondent:</th>
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<td>I object very strongly to Guildford Borough Council’s Draft Local Plan June 2016 which I consider to be unsound and untenable in its present form. Constraints should be implemented on development to protect the rural nature of the existing villages as individual villages in their own right and the country lane infrastructure that supports those villages. If not then these proposals will result in a suburban sprawl on the north side of Guildford and the identity of the area and the green belt and rural character will be lost as urbanisation encroaches on this land.</td>
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<th>15398529 / Judith Linnegar</th>
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<td>The allocation of the land to the strategic sites of Wisley Airfield, Garlicks Arch (Ripley/Send border) and Gosden Hill (Clandon) is not sustainable. The proposed development of these sites will have a negative impact on the surrounding local villages and each of these communities.</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write to object to the proposals to remove Ripley, Send and Clandon from the Greenbelt. There are no special circumstances to do this and once taken "Greenbelt" is lost forever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/959  Respondent: 15398529 / Judith Linnegar  Agent:

I wish to register my objection to the revised local plan for the A43 site, Garlicks Arch.

The impact this will bring on the already stretched local resources and infrastructure will be catastrophic for Ripley and surrounding area.

The housing will be on greenbelt land and the potential increase of housing will be extremely harmful to the rural nature of the surrounding villages of Ripley, Send and Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2461  Respondent: 15398593 / Kirsten Collins  Agent:

I write to object to the proposals to remove Ripley, Send and Clandon from the Greenbelt. There are no special circumstances to do this and once taken "Greenbelt" is lost forever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
A42

I object to the inclusion of this site within the local plan. Development of this site will be used to justify future development plans in the area that will have a significant impact on the semi-rural location that the plans specifies; while careful design can mitigate the immediate impact, I believe that it would have significant impact on the area in the longer-term. Access to the site will be via Tannery Lane that will experience a greater volume of traffic in the near future following the approval of plans for 64 apartments at the tannery and building of the Marina and any further development at Clockbarn nursery would further exacerbate this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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A43

I object to the plans outlined for Site A43. This site is new to the overall plans and was not included in the Regulation 18 draft proposal and so it has not previously had any level of consultation. The removal of this land from the Green Belt requires exceptional circumstances and I do not see that the case has been made for this; in the long-term, developments such as this one may be detrimental to the overall goal of preventing urban sprawl and the merging of settlements such as Guildford and Woking. The provision of housing on this scale at this location would also have a significant impact on the schools in the local area; for example, Send infant school is currently being rebuilt but there is no plan for any increase in capacity. I understand that the site may be prone to flooding and contains an ancient woodland and so the development would endanger trees from C16 and so there are conservation issues with the selection of this site.

I also object to the plans for the industrial development; the 2015 Employment Land Needs Assessment indicated a reduction of 80% in the requirements for employment floor space while this proposal is a repeat of that contained in a previous draft local plan that used an older evidence base. If there is a need for further development of industrial space, there should be consideration given to an expansion of Slyfield as this seems to be a very appropriate site for such.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A43A

I object to the proposed development of the new 4-way interchange with the A3 at Burnt Common. While the provision of appropriate transport infrastructure and services is one of the most pressing issues facing Guildford borough, I am concerned that the combination of this junction and the proposed traffic calming measures in Ripley (as per the strategic highway assessment report) would serve to funnel a significant increased volume of traffic along the A247. This could be further exacerbated by the proposed developments of Wisleyairfield, Blackwell Farm and Gosden Hill that are included in the local plan and it is hard to determine whether the highway assessment report made any attempt to model the impact of these developments. The new A3 junction would also encourage the use of the A247 as a ratrun whenever there are problems on the M25 that people would like to avoid, which would be very detrimental to the character of the local area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2464  Respondent: 15398593 / Kirsten Collins  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A44

I object to the inclusion of this site for development in the local plan. This site is a new proposal that was not included in the Regulation 18 draft and has not been consulted on previously. This is a beautiful area of countryside that would be harmed by development and it fully justifies its current Green Belt designation. The subsoil in this area contains documented unsafe landfill waste which is currently vented, further calling into question its suitability for development. The roads in this area are occasionally narrow single track country roads and so access to this site would be restricted, calling into question the logic of providing 2 Travellers’ pitches here.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5463  Respondent: 15398593 / Kirsten Collins  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
I object to the policy to remove the village of Send from the Green Belt. The Green Belt designation of the village of Send provides a key buffer zone between Woking and Guildford that should prevent them from merging in the future and I do not see the 'exceptional circumstances' referenced in 4.3.16. The Government notes that there are 5 main purposes to Green Belt land and I contend that the Green Belt designation of Send is important for maintaining the first 3 of these (listed below).

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

In particular, areas of land proposed for removal from the Green Belt include areas behind the school consisting of playing fields and woodland, which are important to the character of the local community and the quality of its schooling, as well as land around the Wey navigation near Cartbridge that should not be encroached upon. I only recently moved to the area and I was attracted by the easy access to the countryside that living in Send would afford me and I believe that this proposal will threaten that, making Send a less appealing village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
2. All the new housing developments: It is true we need more houses, but then we also need the wider roads, the transport, the parking places, the schooling as well the clinic and health department. All the talking is about so many houses, but not one word if you planning a new station, etc.

The roads in East Horsley or the Horsley are terribly narrow. These enormous trucks taking the right away the bigger family cars this is asking for many accidents. Then there will be no facility for medical dealing with it, the parking at the stations are not big enough. So start with the essential construction to create a new village such as shops, schooling, medical place, station, electricity, gas, telephone lines and sewer system.

When that is in place, then think of all the heavy trucks going using the short cut in our village, so narrow the entrance into our roads from the A3, 246, and Cobham.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5464  Respondent: 15398625 / Tineke Robertson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1 The Green belt: Well there is such a lot of talking about the environment, the climate change. We need our greenbelt and not have it concreted over with roads and housing developments. We need our trees, shrubs, wildlife etc.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1380  Respondent: 15398657 / Kim Roberts  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
22. APPENDIX C

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1379  Respondent: 15398657 / Kim Roberts  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

2. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

3. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1382  Respondent: 15398657 / Kim Roberts  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
I OBJECT to the Strategic Housing Market Assessment (SHMA) figure of 693 houses per annum in the borough being too high (Appendix D).

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to:
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process accountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
20. POLICY A25 - Gosden Hill Farm

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data: 2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents 2015
- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays

Surrey Fire and Rescue deployed. 2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane

Burpham

- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further.speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.
The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPS16/2466  **Respondent:** 15398657 / Kim Roberts  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

20. POLICY A43 AND A43a – Garlick’s Arch

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council’s eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. I have personally been involved in an accident at this junction within the last 5 years due to heavy traffic queing and obstructing the sight line to exit Oak Grange Road. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of...
Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4) It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. POLICY D3

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3).

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5482  Respondent: 15398657 / Kim Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY D3

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5483  Respondent: 15398657 / Kim Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. POLICY D4

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5471   Respondent: 15398657 / Kim Roberts   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

1. POLICY E1

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non- sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development. If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floor space will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floor space to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5472  Respondent: 15398657 / Kim Roberts  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E2

I object to the location for new employment floor space (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floor space will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floor space to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5473  Respondent: 15398657 / Kim Roberts  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. POLICY E5

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5485  Respondent: 15398657 / Kim Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E6

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourism. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
3. To help private providers market local This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5481  Respondent: 15398657 / Kim Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E7

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy. There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF. The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5479  Respondent: 15398657 / Kim Roberts  Agent:
1. POLICY H1

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university’s ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. POLICY H2

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5484  Respondent: 15398657 / Kim Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H3

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.
The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations were available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. There are regular traffic accidents in the village due to over demand of smaller roads. (An accident occurred only yesterday at the entrance to Oak Grange Road) Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy 11. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of house building as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy 11 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.
Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable. There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5476  Respondent: 15398657 / Kim Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY I2

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5478  Respondent: 15398657 / Kim Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3
1. POLICY I3

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/5469  **Respondent:** 15398657 / Kim Roberts  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

1. POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.
The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of, Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5486  Respondent: 15398657 / Kim Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

SITES - POLICIES A1 TO A57

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5470  Respondent: 15398657 / Kim Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY P4

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.
The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Re: Responses to Guildford Borough Proposed Submission Local Plan (June 2016)**

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

1. POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1) The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the
Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLP16/5466  **Respondent:** 15398657 / Kim Roberts  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

1. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.
The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market. These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere.
Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1. Questions posed by Guildford Borough Council as part of its consultation. Questions from GBC
20.A. Question 1: The evidence base and submission documents
The Proposed Submission Local Plan: strategy and sites is based on up-to-date evidence.
The evidence base documents contributing to the preparation of the plan are listed in Appendix D and can be found on our website (links open in a new window).

Do you agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant?

ANSWER

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

20.A. Question 2: Legal Compliance

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole is legally compliant? Please provide the following information being as precise as possible:

• why you consider it is or is not legally compliant and
• what change(s) (if any) you consider necessary to make it legally compliant, explaining why this is the

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.
That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/919  Respondent: 15398657 / Kim Roberts  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

20.A. Question 3: Soundness

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound? Please provide the following information being as precise as possible:

• why you consider it is or is not sound and
• what change(s) (if any) you consider necessary to make it sound, explaining why this is the case

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of "About Guildford" (published by the Council) on page5. This is demonstrably untrue and appears designed to bias the consultation process.

2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.

3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt

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Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites- which amount to 65% of the proposed housing number.

5. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.

6. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

7. Much of the infrastructure required to support the level of development proposed is outside the Council’s The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

8. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

9. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation

10. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation

11. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound

12. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018

13. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars

14. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham

15. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework

16. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.

17. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involv These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

18. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens

19. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing The Council has prevented councillors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

20. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

21. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

22. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

23. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/920  Respondent: 15398657 / Kim Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

20.A. Question 4: Duty to cooperate

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate? Please provide the following information being as precise as possible:

- why you consider it has or has not complied with the Duty to cooperate and
- what change(s) (if any) you consider necessary to make it comply with the duty to cooperate, explaining why this is the

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

| 1. | I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches |
| 2. | It ignores all the thousands of previous objections made by local people |
| 3. | There is no proven demand for travelling show people plots in this location |
| 4. | There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints. |
| 5. | The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required. |
| 6. | This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green belt be intent on conserving it rather than exploiting it. |
| 7. | The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy. |
| 8. | Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided. |
| 9. | The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result. |
| 10. | I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached. |
| 11. | I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site. |
| 12. | I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. |
| 13. | I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600. |
| 14. | I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads. |
15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.
9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.
10. The impact on small surrounding roads will create traffic gridlock.
11. It will join up existing villages and defeat the purpose of the Green Belt.
12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.
13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.
14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.
15. I object to the potential impact of para 4.4.23a on Burnt Common with its over allocation of industrial zoning is subterfuge for a waste management facility which is a dishonest and underhand approach to planning and proper consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: pslp171/3174  Respondent: 15398657 / Kim Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp17q/640  Respondent: 15398657 / Kim Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2467  Respondent: 15398721 / J.M. Nokes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
There was no mention in the original plan of the introduction of new sites (Garlick Arch) and a slip road on the A3 at Burnt Common has simply been added to the Draft Plan without consultation or, worse still, without Highways England consent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Respondent: 15398721 / J.M. Nokes</th>
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Removing villages from the Green Belt without higher authority permission is monstrous and cannot be allowed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object. In the most vehement terms imaginable to the completely unacceptable Draft Local Guildford Plan.

The number of new houses proposed is totally unrealistic for the small country lanes concerned to be able to absorb let alone the appalling amount of additional traffic noise that would be generated.

Why has the number of houses to be built per year been so excessively raised? There is, apparently no reason for this increase so one is forced to conclude that the wishes of the developer for large-profit has been put ahead of any thought of social need.

The distribution of houses in the Borough is cockeyed. The North-East has taken an unsustainable number where the lanes are narrow and the volume of traffic at present using through routes causes awful gridlock during rush hours.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5490  Respondent: 15398721 / J.M. Nokes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Way the Plan has been drawn up is flawed. Guildford Borough Council's planning consultants have not taken account of Surrey County Council's highway planners views or the costs involved in improving the infrastructure which is, anyway, outside their financial capability.

Additionally, no regard has been given to village Neighborhood plans which should have been taken into consideration.

I further object to the 2016 Draft Local Plan as it has given no attention to the number of schools required or any thought about the medical or hospital facilities needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2325  Respondent: 15398817 / Kitewood Estates (Sara Sweeney)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objectively Assessed Need

The need to Identify a deliverable supply of new housing land is set out within the Government's National Planning Policy Framework (NPPF), and National Planning Practice Guidance (PPG).

The National Planning Policy Framework (NPPF) places great emphasis on the need to boost significantly the supply of housing (Para 47). Local planning authorities should use the evidence base to ensure that the Local Plan meets the full Objectively Assessed Need (OAN) and furthermore, there is a legal requirement for local planning authorities to consider all reasonable alternatives on how to deliver this need.
Specifically, in relation to plan-making, local planning authorities should ensure that the Local Plan base is up-to-date (Para 158, NPPF), as this will be the starting point in the process. PPG elaborates on this and requires that the starting point for determining the OAN should be derived from the most up to date population figures.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4441  Respondent: 15398817 / Kitewood Estates (Sara Sweeney)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A27

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site Context

The 13.Sha site is located to the east of Ash Green and comprises agricultural fields with several blocks of mature tree belts. The site is bounded by residential gardens to the west, and enclosed by trees on the north, eastern and southern boundaries (Refer to the Location Plan at Appendix)

The site is designated Green Belt on the adopted proposals map. The tree belt along the northern and southern boundaries of the site are designated as a Site of Nature Conservation interest.

The site is also located 1.7km from the Thames Heath Basin Special Protection Area, which is also a Site of Special Scientific Interest (SSSI).

The plan at Appendix 2 shows that the site comprises three main parcels which are currently grazed by cattle and sheep.

Proposed Submission Local Plan

The site is not proposed for development in the Proposed Submission Local Plan, nor has it been previously promoted as an available site. However, the site is now available and there are no known constraints that would prevent the site coming forward for development. Parcel 1 (Refer to Appendix 2) is located directly adjacent to the settlement boundary and is contained by woodland to the north, east and south.

We note that the Council proposes that following sites at Ash Green are removed from the Green Belt and allocated for residential development (C3 use);

- POLICY A27: Warren Farm, White Lane, Ash Green (approximately 158 dwellings)
- POLICY A28: Land to the 8Ut of White Lane, Ash Green (approximately 82 dwellings).

Kitewood Estates do not wish to challenge the proposed allocations at Ash Green, albeit we do wish to make the point that the land at Sunnybrook Farm is equally suitable for development and poses the opportunity for ecological enhancements.

Ecology Considerations
Derek Finnie Associates undertook an ecological Phase 1 Assessment of the site in July 2016 (encl. Appendix 3) and concluded;

- Overall the biodiversity value of the Site is of moderate level due to the SNCI designation and the presence of Ancient Woodland. However, the majority of the Site, which supports improved grassland, is of negligible value;
- If SANGS are to be provided In situ, there is likely to be ample opportunity to provide biodiversity improvements without compromising the main objectives of the SANGS. If contributions towards off-site SANGS is adopted, then scope would be available within landscaped areas of the Site to provide enhancement of the biodiversity value of the Site (Phase 1 Habitat Assessment (July 2016)).

Guildford Borough Green Belt and Country Side Study

The site is assessed in Land Parcel H18. Land parcel H18 is considered to have high Green Belt sensitivity. The study concluded that the following Green Belt proposes are met by this land;

- Purpose 1: checks the Eastward sprawl of Ash Green; and
- Purpose 3: minimal existing development therefore safeguards the countryside from encroachment.

In the context of the Green Belt purposes, the site is well contained by a dense tree belt on the eastern boundary and therefore acts as a barrier to eastern sprawl.

The development of the site would inevitably result in increased built-form in the countryside. However, any scheme could offer the opportunity to deliver new community infrastructure and help improve accessibility to outdoor recreation. Parcel 1 (as identified at Appendix 2) would only represent a slight encroachment on the open countryside and the remainder of the site has various opportunities for biodiversity enhancements. Ultimately the allocation of this site would not undermine the integrity of the countryside.

Development Potential and Deliverability

Land Parcel 1 (identified at Appendix 2) is approximately 4ha (excluding the tree belt) and could comfortably accommodate in the region of 90-120 dwellings.

There are no barriers to the deliverability of the site which would prevent or delay housing coming forward within the short term. The infrastructure and design requirements associated with the development are relatively minor compared with other strategic sites within the Plan.

Overall, Kitewood Estates suggest that the best approach for the Council to maintain a deliverable five year housing land supply against the up-to-date OAN, is to ensure the release of a range of sites, of varying sizes, in several locations.

If the site is proposed to be removed from the Green Belt and proposed for allocation, we would expect the site to begin delivering houses within the first five years of the Plan. Alternatively, the site could be safeguarded as a future allocation should the housing need increase during the Plan period.

Conclusions

Overall, the plan appears to have been positively prepared in an attempt to fully meet the Council's Identified Objectively Assessed Need. Albeit, the evidence base behind the OAN is out of date and on that basis could be considered unsound.

The land at Sunnybrook Farm, Ash Green has few constraints and offers the opportunity to deliver further dwellings during the Plan period.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Kitewood Estates.pdf (605 KB)
The Proposed Submission Local Plan (July 2016) (Regulation 19 consultation) sets out that the council will make provision for 13,860 additional new homes (Policy S2) over the plan period (2013-2033). This equates to an annual figure of 693 dwellings per annum. This is made up of 517 homes, with an uplift of 25 homes for student growth, 120 homes for economic growth and 31 homes to address market signals and affordability (total693).

This figure of 693 dwellings per annum is taken from the West Surrey Strategic Housing Market Assessment (SHMA) - Guildford Summary Report (October 2015) prepared by GL Heam (Section 4 - Objectively Assessed Need).

The 2015 SHMA applies household foundation rates from the 2012-based household projections to the 2012-based ONS Sub-National Population Projections to provide the starting point for considering housing need. This approach is fundamentally unsound because further projections have since been published.

Since the publication of the mid-2012 population projections in 2013, mid-year population projections have been published for mid-2015, mid-2014 and mid-2013. As a minimum, the mid-2014 projections should have been used as the basis for the 2015 SHMA which was prepared in 2015 and published in October 2015, well after the mid-2014 projections were published.

Between both 2013-2014 and 2014-2015, the population of the UK increased by approximately 0.8% overall, year on year. In both time periods, the population growth in the year to mid-2014 and mid-2015 was greatest in southern and eastern England. It can therefore be expected that this will have a significant effect on the household projection rates which would be applied in the SHMA relating to Guildford and the surrounding Housing Market Area.

Overall, the Plan does appear to have been positively prepared. However the OAN will need to revisited before the Plan Is submitted for Examination. The Plan should also build in a contingency for an early review should any of the strategic allocations under deliver or should the neighbouring Local Authorities’ Local Plans be delayed or if they are unable to meet their OAN.

We anticipate that, if this analysis were undertaken, the objectively assessed housing need for the Borough Is likely to increase.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I wish to register my objection to the above plan for the following reasons:

1. Lack of protection for the Green Belt
2. Disproportionate housing development in our area, resulting in over-loaded schools, health services and public transport
3. Major traffic congestion on already vastly overcrowded and congested roads
4. Air pollution from thousands of extra cars affecting children and the elderly
5. Pedestrian and cyclist safety on crowded local roads with no footways
6. No guarantee of enough affordable housing for young families.

These are just the immediate concerns, but as a local resident who drives to Kingston every day to work, and also has to use the local roads at peak travel times, the congestion on the local roads is already appalling.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2475  Respondent: 15399041 / Sue Ely  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Gosden Hill development being in the Local

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham's sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost. How is this going to be funded?

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size. How is this going to be addressed?

Electricity supply is also inadequate and would require a big infrastructure development. The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England's requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an "aspiration" in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2476  Respondent: 15399041 / Sue Ely  Agent:  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the inclusion of the land at Garlick's Arch, Send Marsh/Burnt Common and Ripley {A43}

Garlick's Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).
The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick's Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced by a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council's own Green Belt & Countryside Report does not address Garlick's Arch at all, so there is no evidence base to support the inclusion of this site. National Planning Policy promotes sustainable developments, with sustainable transport.

With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy 13).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hour no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy 11)

Furthermore, several electricity pylons run through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved and negative impact on air quality and the health and safety of pedestrians and cyclists and increase noise pollution.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

The proposed development at Garlick's Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick's Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (Blc), general industrial (B2) and storage and distribution (B8) at Garlick's Arch (A43) is in the scheme of industrial development relatively small. Just to
the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick's Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the location for new employment floor space at Garlick's Arch - Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class Blc, 82 and 88) floor space will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floor space to be located at Garlick's Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the loss of rural employment (Policy E5)

Policy ES supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick's Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.
I object. Tourism and visitors do not depend on new visitor "attractions" and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner.

In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/"Disneyfication". Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many "leisure and visitor attractions" already. The case for creating more is not made and no examples are given. Instead, the plan's explicit priorities should be:

1. To protect the borough's prime leisure and tourism asset, its countryside, from inappropriate development This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
2. To help make Guildford's river landscape less off-putting and support town-break packages for high-value visitors. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
3. To help private providers market local tours. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An "English town break" (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travel card for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

1. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object (POLICY H1- Homes for all)

Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim is necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area.

Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council's timidity is a case of "regulatory capture" by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog's Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5524  Respondent: 15399041 / Sue Ely  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object. This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the "mix" this can include "market" housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.
The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove "exceptional circumstances."

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/5519  **Respondent:** 15399041 / Sue Ely  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** (

I object, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians. The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements. There is the local school with young children walking along the road on a Monday to Friday basis, which is dangerous with the current level of traffic prior to any increased traffic that would result from further housing on the proposed scale.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/5520  **Respondent:** 15399041 / Sue Ely  **Agent:**
I object to the lack of proper infrastructure planning for sites (Policy I1)

Policy 11 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick's Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents' in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick's Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied? In summary the health and safety of existing communities are detrimentally impacted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5521  Respondent: 15399041 / Sue Ely  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy 12)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 &
M25 are already at over capacity levels during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that "Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health." The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3. I object to not protecting the Green Belt (Policy P2)

I object to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick's Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a 'special circumstance' and the land to be taken from the Green Belt. Once taken the Green Belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and
the countryside encroached. GBC's Green Belt & Countryside Report does not address Garlick's Arch, so there is no
evidence base to support including this site.

Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common,
with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/5505  **Respondent:** 15399041 / Sue Ely  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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1. I object to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including
factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the
range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide
development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the
document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough's
identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the
exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick's Arch (A43) is identified on the Environment Agency's flood map as being in a flood Zone 3 from a
river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood
risk, the site has been assessed as part of the Council's SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual
probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the
flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-
commissioned to accurately reflect the actual flooding risks of each site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/5493  **Respondent:** 15399041 / Sue Ely  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion, safety for pedestrians and cyclists in particular and greater pollution. Residents, health and safety and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5496  Respondent: 15399041 / Sue Ely  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2. I object to the Borough Wide Strategy (Policy S2)

   1. The borough wide strategy is poorly conceived. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey. What is the robust rationale for this?

   1. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

   1. The housing number is based on an arbitrary Housing Market Area (HMA): the "West Surrey" tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view,

   "West Surrey" is much too small. Half of Guildford borough's residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside "West Surrey". Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-
These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make "West Surrey" reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour's "need".

Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced and detrimental.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation of Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Policy A26 (Blackwell Farm)
I am writing to object strongly to the above policy in the Guildford Local Plan. There are many reasons why this Policy is unsuitable (pollution, loss of countryside and many more) and these have been discussed over many years but my main objections are as follows.

Land was removed from the Green Belt 15 years ago at Manor Park to allow expansion of the University but the University has failed to build on this land with only one third of the planned university residences being built since then. The University states that it is playing its part in addressing the housing need in Guildford but the 1,800 houses being planned for the site at Blackwell Farm will not provide the affordable housing Guildford needs.

There are no grounds for yet more Green Belt land being taken under "exceptional circumstances" with this obligation of the University still outstanding. I agree with the CPRE who have stated that by delivering more student housing on its existing campuses, the University would free up more than 1,000 affordable homes in the town centre for key workers and their families. The University should also increase the density of buildings and offices on its neighbouring Surrey Research Park, rather than seek to harm some of the best countryside in the area.

Equally important is the proposed access road from the A31 Hogs Back to the hospital roundabout at Egerton Road, with a
large junction with roundabout and signal lights at the entrance to Down Place, at the top of Down Lane. It is a fact that the traffic along this stretch of the A31 westbound before it joins the A3 is already at breaking point. Queues build up throughout the day and the slightest incident on the A3 or in Guildford itself causes total chaos. The thought of another 1,800 home owners, with probably twice that number of cars, accessing this major artery at all times of the day and night does not bear thinking about.

The development at Blackwell Farm is entirely inappropriate, unnecessary, harmful and will cause untold damage and disruption not just while it is being built but will only get worse in the future.

I urge you to listen to the valid points being made by everyone who has an interest in preserving our countryside and who has access to the road network which will be affected, becoming increasingly worse in the years to come.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2470  Respondent: 15399137 / Jill Clayton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2472  Respondent: 15399361 / John Christopher Grice  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I have read the documents dated 13th June 2016, and 4th July 2016, submitted to Planning Policy, Guildford Borough Council by East Horsley Parish Council (EHPC) setting out its objections to Proposed Submission Plan and Policy A35. I support the views expressed by EHPC and object to both proposals on the same grounds. They do not need repetition.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/5527</th>
<th>Respondent:</th>
<th>15399521 / Barbara J Aldrick</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
<td></td>
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</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Congestion on roads unsustainable- narrow roads especially in Burpham at roundabout London Road, Inn Lane. Existing A3 to deal with additional demand until? 2023-2027.

Major transport issues are unresulted apparently e.g. tunnel?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I very strongly object to the 2016 Draft Local Plan for the following reasons: Development of nearly 14,000 houses is unsustainable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Total records: 4571.